PERFECT MUDRA PRIVATE LIMITED
(Formerly known as Perfect Synergy Advisory Services Private Limited)

Privacy Policy

Version History

Version	Approved by	Date of Approval/Review
1.0	Board	December 20, 2025

1. Objective

This Policy defines the measures and standards to adhere to when handling personal information collected and processed by **"Perfect Mudra Private Limited"** (formerly known as Perfect Synergy Advisory Services Private Limited) (hereinafter referred to as "**Perfect Mudra**") in any form, intended to safeguard the personal information of its employees and clients. The policy mainly focuses on generally accepted business unit principles:

- Management
- Notice
- Choice and Consent
- Limiting Collection
- Limiting Use, Disclosure and Retention
- Quality
- Security
- Openness
- Individual Access
- Monitoring and enforcement

This Policy also aligns with the provisions of the *Digital Personal Data Protection Act, 2023* ("DPDP Act") and the RBI Master Direction on Information Technology Governance, Risk, Controls, and Assurance Practices, 2023, to the extent applicable to the Company's scale and nature of operations.

2. Scope – Organizational and Technical

This Policy applies to all personal data collected, processed, or stored by Perfect Mudra Finance Private Limited ("Perfect Mudra") across its lending and support functions. It covers all employees, directors, authorised representatives, and service providers who handle customer or employee information in any manner.
The scope includes the information-handling processes currently undertaken by Perfect Mudra in the normal course of its lending business, such as:

- Collection and verification of customer information and documentation.
- Use of personal data for loan assessment, sanction, disbursement, servicing, and recovery.
- Management of employee personal information for HR and administrative purposes.
- Secure access, retention, and disposal of records through authorised systems or controlled environments.

This Policy will be updated as and when Perfect Mudra's operations evolve or when new regulatory requirements necessitate modifications in data-governance practices.

3. Policy Details

a) Policy Statement

- Perfect Mudra shall implement controls for the protection of the personal information of users in line with the Business unit requirements of respective clients to whom Perfect Mudra provides services.

- This Privacy Policy sets out the procedures adopted by Perfect Mudra to ensure compliance with applicable data protection and privacy laws in India, including the Information Technology Act, 2000 and the Digital Personal Data Protection Act, 2023.

- Perfect Mudra shall adopt a proportionate approach to data privacy and information security based on its size, operations, and risk exposure.

b) Governance & Responsibility

- Perfect Mudra shall designate a Data Protection Officer (DPO) or equivalent Compliance Officer responsible for oversight of data protection compliance. The DPO shall ensure adherence to this policy, oversee training and breach response, and act as a point of contact for data protection matters.

- The Compliance Officer shall be designated as the *Data Protection Officer (DPO)* for the purposes of monitoring adherence to this Policy and ensuring compliance with applicable laws, including the Digital Personal Data Protection Act, 2023 and RBI's IT Framework for NBFCs.

c) Data Classification and Retention

- Perfect Mudra shall classify personal data according to sensitivity and retention requirements. Data shall be retained only for the period necessary to meet regulatory, operational, or legal requirements and shall be securely destroyed thereafter.

4. Choice and Consent

- Perfect Mudra shall seek consent through appropriate means from the users before collection, use, or disclosure of their personal information for the identified business purposes. This process shall be implemented as per applicable Indian laws and RBI guidelines.

- Perfect Mudra shall document all exceptions and identify and support those instances wherein information can be collected, used, or disclosed without consent. Where it is deemed inappropriate to obtain consent, Perfect Mudra shall provide a documented rationale to support the exception;

- Perfect Mudra shall ensure that consent forms, KYC documents, and application forms clearly state the purpose for which information is collected and the rights of the individual under the DPDP Act.

- Perfect Mudra shall ensure that the consent obtained is informed consent. In case of subsequent uses or disclosures of personal information, Perfect Mudra shall seek consent after collection but before use;

- Perfect Mudra shall ensure that it will never require an individual to consent, as a condition of supplying a product or service, to the collection, use or disclosure of information beyond what is necessary to fulfil explicitly specified and legitimate purposes;

- Perfect Mudra shall state and explain purposes in such a manner that the individual can reasonably understand how the personal information will be used or disclosed;

- Perfect Mudra shall allow the users to withdraw consent at any time and inform them of any consequences of withdrawing consent;

5. Limiting Collection

- Perfect Mudra shall collect only the minimum personal information required to meet the identified business purposes from the users without misleading or deceiving the user about the purposes for collection.
- Perfect Mudra shall collect personal information by fair and lawful means and document its collection practices in the form of internal process notes.
- Perfect Mudra shall institute procedures for the secure destruction or disposal of personal information and secure disposal of equipment or devices used for storing personal information.
- Perfect Mudra shall not collect biometric or digital data except where specifically required for regulatory KYC purposes under RBI or statutory guidelines.

6. Openness

- Perfect Mudra shall be open about its information management practices with the users and make specific information about its policies and practices relating to the management of personal information readily available to the users if asked for.
- Perfect Mudra shall publish a concise privacy notice on its website and make a physical copy available at its branch offices for reference by customers.

7. Individual Access

- Perfect Mudra shall inform the users of the existence, use, and disclosure of their personal information on a written request from the user. In exceptional situations where Perfect Mudra may not be able to provide access to the user's personal information it holds, Perfect Mudra shall provide reasons for not providing access to the user.
- Perfect Mudra shall inform the users of the procedure to be followed for accessing their personal information.
- Perfect Mudra shall provide requested information in a generally understandable format.
- Perfect Mudra shall be as specific as possible about third parties to which personal information about an individual has been disclosed where possible.
- Perfect Mudra shall allow the users to challenge the accuracy and completeness of their personal information, and it shall amend the information where appropriate. When a challenge is not resolved to the user's satisfaction, Perfect Mudra shall keep a record of the details of the unresolved challenge.

8. Data Security Controls

a) Perfect Mudra shall maintain reasonable security safeguards to protect personal data against unauthorized access, alteration, disclosure, or destruction. This includes:

(a) password protection of systems;
(b) restricted user access;
(c) CCTV monitoring of storage areas;

(d) periodic data backup and recovery testing.

9. Incident Management and Breach Reporting

a) Any data breach or loss shall be reported promptly to senior management and, where required, to the Data Protection Board or RBI within prescribed timelines.

10. Training and Awareness

a) All employees shall undergo periodic awareness training on data privacy and security practices, including handling of physical loan documents and personal data.

11. Monitoring and Enforcement

a) Perfect Mudra shall periodically review the implementation of this Policy and effectiveness of controls for privacy protection through internal audits or compliance checks and take corrective action wherever gaps are identified.

12. Governance and Review

- Perfect Mudra's Board of Directors shall have overall oversight of the implementation of this Policy and the protection of personal information.
- The Policy shall be reviewed periodically, and whenever required due to changes in regulatory requirements, business operations, or technology architecture.
- Significant changes or updates to this Policy shall be placed before the Board for approval.

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