

Policy on Storage of Data

This Policy is framed in accordance with the RBI Guidelines on Digital Lending (September 2022), the RBI Master Direction on Information Technology Governance, Risk, Controls and Assurance Practices, 2023, and applicable data-protection law.

1. Data localisation

All personal information of customers, including credit data and KYC data, is stored exclusively on servers located within India. No biometric data is stored on the Company's systems.

2. Categories of data stored

- Identity and contact details (KYC).
- Financial and credit information required for underwriting.
- Loan account data, repayment history and statements.
- Application logs, audit trails and risk-monitoring data.

3. Data minimisation

The Company collects only such data as is necessary for the loan product offered and for compliance with applicable law. No data is collected from the customer's mobile device except basic technical attributes (device fingerprint, IP address) required to prevent fraud.

4. Security controls

- Data at rest is encrypted (AES-256). Data in transit uses TLS 1.2 or higher.
- Role-based access control with multi-factor authentication.
- Quarterly vulnerability assessments and annual penetration testing.
- Comprehensive audit logging and 24x7 SIEM monitoring.

5. Retention

Customer data is retained for the duration of the loan and for a further period of 10 years from closure of the account, as required by the Prevention of Money-Laundering Act, 2002 and RBI KYC Master Direction.

6. Third-party processors

Where the Company engages third-party service providers (cloud infrastructure, KYC, credit bureaus), they are bound by written data protection agreements that mirror the obligations of the Company under this Policy and applicable law.

7. Customer rights

Customers may request access to or correction of their personal data by writing to dpo@evamfinance.com. Further details are set out in the Privacy Policy.

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