



Privacy Notice

Version 1.0

Document Owner and Approval

The Compliance manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the Privacy Policy.

A current version of this document is available to all members of staff on the corporate intranet and is published on bulletin board of the company.

This procedure was approved by the Compliance Officer on 02nd Jan 2019 and is issued on a version controlled basis under his signature. This policy is reviewed on annual basis.

Signature:

Date:

Versions				
Version	Date	Author	Reviewed By	Approved By
Base Document	2 nd January, 2019	Vikas	Suresh	K.R.Tagore

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1. Scope

All data subjects whose personal data is collected, in line with the requirements of the Virinchi Limited.

2. Responsibilities

2.1 The Compliance Manager/Project Manager/ CEO/ CLO/Account Manager is responsible for ensuring that this notice is made available to data subjects prior to Virinchi Limited collecting/processing their personal data.

2.2 All Employees/Staff of Virinchi Limited, who interact with data subjects, are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Founded in 1990, Virinchi Limited is a BSE listed, Fintech and Healthcare company with a Market leading Loan Management System for Short Term Micro Credit Industry, Full Scale IT services with deep competency in Analytics & Mobility and Healthcare Delivery Business in India comprising Three Operating Hospitals with a Pan-India Healthcare Mobility solution.

The 1400 people firm is led by First Generation IIT/IIM Entrepreneurs and operates out of its Corporate Office in Banjara Hills, Hyderabad & US Headquarters at Edison, New Jersey.

Our Compliance Manager and data protection representatives can be contacted directly here:

- tagore@virinchi.com
- (+91-9866612417)
- yugandhar@virinchi.com
- +91-9985163585

The personal data we would like to collect from you is:

Personal data type:	Your name, address, date of birth, email, telephone financial data, status and history, number of dependents, transaction data; contract data, details of the credit products you hold with us, signatures, identification documents, salary, occupation, other loans, previous addresses, spouse, partners, nominations, Tax Identification, passport details, driver's license, utility bill, insurance policy, Government documentation, bank statements, credit card statements, other loan statements, valuations, interactions with Virinchi Limited.
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The personal data we collect will be used for the following purposes:

- ✓ Assessing your loan application and determining your creditworthiness for a loan.
- ✓ Verifying the information provided by you in the application.
- ✓ We may use credit scoring techniques and other automated decision making systems to either partially or fully assess your application.

The special categories of personal data concerned are:

- ✓ Information about your health, including any medical condition, health and sickness.

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Virinchi Limited to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the Compliance Manager at

Email:tagore@virinchi.com

Contact Number: +91-40-48199999

3.3 Disclosure

Virinchi Limited will not pass on your personal data to third parties.

3.4 Retention period

Refer to Retention Period Policy.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.

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- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Virinchi Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

3.5 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Virinchi Limited, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Virinchi Limited's Compliance Manager.

The details for each of these contacts are:

	Supervisory authority contact details	[Compliance Manager] contact details
Contact Name:	M. Yugandhar	K.RAVINDRANATH TAGORE
Address line 1:	8-2-672/5&6, 4 TH FLOOR, ILLYAS MOHAMMED KHAN ESTATE,	8-2-672/5&6, 4 TH FLOOR, ILLYAS MOHAMMED KHAN ESTATE,
Address line 2:	ROAD NO 1	ROAD NO 1
Address line 3:	BANJARA HILLS	BANJARA HILLS
Address line 4:	HYDERABAD, TELANGANA, INDIA	HYDERABAD, TELANGANA, INDIA
Address line 5:		
Email:	Yugandhar@virinchi.com	TAGORE@VIRINCHI.COM
Telephone:	+91-99851-63585	+91-40-48199999

4. Online privacy statement

Personal data

Under Virinchi Limited, personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

This privacy notice tells you how we, Virinchi Limited, will collect and use your personal data for providing financial services. Data collection, processing and use are conducted for the purpose of facilitating the above mentioned objectives.

Why does Virinchi Limited need to collect and store personal data?

In order for us to provide you our product(s) we need to collect personal data for detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Virinchi Limited would contact you for additional consent.

How will Virinchi Limited use the personal data it collects about me?

Virinchi Limited will process (collect, store and use) the information you provide in a manner compatible with the Data Protection Regulations. We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. Virinchi Limited is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Virinchi Limited contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that Virinchi Limited holds about me?

Virinchi Limited at your request can confirm what information we hold about you and how it is processed. If Virinchi Limited does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organization that has determined how and why to process your data.
- Contact details of the Compliance Manager, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Virinchi Limited.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- We will ensure there are specific measures in place to secure your information.
 - ✓ How long the data will be stored.
 - ✓ Details of your rights to correct, erase, restrict or object to such processing.
 - ✓ Information about your right to withdraw consent at any time.
 - ✓ How to lodge a complaint with the supervisory authority.
 - ✓ Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
 - ✓ The source of personal data if it wasn't collected directly from you.
 - ✓ Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Virinchi Limited accepts the following forms of ID when information on your personal data is requested:

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[Passport, Driving License, Tax Identification, Utility Bills & Bank Statements (of last 3 months), etc.]

Contact details of the Compliance Manager:

	Supervisory authority contact details	[Compliance Manager] contact details
Contact Name:	M. Yugandhar	K.RAVINDRANATH TAGORE
Address line 1:	8-2-672/5&6, 4 TH FLOOR, ILLYAS MOHAMMED KHAN ESTATE,	8-2-672/5&6, 4 TH FLOOR, ILLYAS MOHAMMED KHAN ESTATE,
Address line 2:	ROAD NO 1	ROAD NO 1
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Address line 5:		
Email:	Yugandhar@virinchi.com	TAGORE@VIRINCHI.COM
Telephone:	+91-99851-63585	+91-40-48199999