

Seven Fincorp (7fin)

Privacy Policy

Personal Data Protection & Processing Notice

Legal Entity Noxven Ventures (OPC) Private Limited

Document Privacy Policy — Personal Data Protection & Processing Notice

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Jurisdiction Republic of India

Language English (Binding Text)

Data Protection Officer contact@sevenfincorp.com

IMPORTANT NOTICE: This document contains legally binding obligations. Please read all provisions carefully before using the Platform or Services. By accessing or using our Services, you confirm that you have read, understood, and agree to be bound by these terms in their entirety. If you do not agree, you must discontinue all use of the Platform immediately.

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1. Introduction, Scope & Regulatory Framework

1.1 Our Commitment to Privacy

Noxven Ventures (OPC) Private Limited, operating under the brand name Seven Fincorp (also referred to as '7fin', 'we', 'us', or 'our'), is deeply committed to protecting the privacy, confidentiality, and security of personal data belonging to all individuals who interact with our Platform or avail our services.

This Privacy Policy ('Policy') describes in detail how we collect, use, store, share, and protect your personal data, and the rights available to you as a Data Principal under applicable law. We encourage you to read this Policy carefully before providing any personal information or using the Platform.

1.2 Scope of This Policy

This Policy applies to all Users of the Platform — including prospective borrowers, registered users, and any person whose personal data is processed by us in the course of providing services. It applies across all digital channels through which the Platform is made available: website, mobile application, and other digital interfaces.

This Policy does not apply to the data practices of third-party websites, applications, or services to which we may link. We recommend reviewing the privacy policies of any third party before submitting your information.

1.3 Regulatory Framework

Seven Fincorp processes personal data in accordance with applicable data protection laws and regulations in India, including the Digital Personal Data Protection Act, 2023 ('DPDP Act') and rules thereunder, as well as applicable guidelines issued by relevant financial sector regulatory authorities governing digital lending and data protection.

We adhere to the following data protection principles:

- **Lawful Processing:** We process personal data only on a valid legal basis, including consent, contract necessity, and legitimate interest.
- **Purpose Limitation:** Personal data is processed only for the specific purposes disclosed in this Policy.
- **Data Minimisation:** We collect only the minimum personal data necessary for the stated purpose.
- **Accuracy:** We take reasonable steps to maintain the accuracy and currency of personal data.
- **Security Safeguards:** We implement appropriate technical and organisational security measures.
- **Accountability:** We maintain records and adopt processes to demonstrate compliance with these principles.

2. Data We Collect & Data Minimisation

2.1 Data Minimisation Principle

Seven Fincorp follows the principle of data minimisation and collects only such personal information as is reasonably necessary for the disclosed purposes. We do not collect excessive or irrelevant personal data. Our data collection practices are reviewed periodically to ensure ongoing adherence to this principle.

2.2 Categories of Personal Data We Collect

We may collect the following categories of personal data, subject to applicable law and consent:

- Identity Data: Full legal name, date of birth, gender, photograph, and government-issued identification numbers.
- Contact Data: Mobile number, email address, current residential address, and permanent address.
- Financial Data: Income details, employment status and employer details, bank account information, and existing loan obligations.
- KYC Documents: PAN card, Aadhaar (Masked where permissible), Voter ID, Passport, or Driving Licence.
- Credit Data: Credit bureau reports and scores, accessed with your explicit prior consent.
- Device & Usage Data: IP address, device identifiers, browser type, operating system, pages visited, and session data.
- Communication Records: Records of interactions between you and Seven Fincorp's support teams.
- Transaction Data: Details of financial transactions facilitated through the Platform.

2.3 Masked Aadhaar

Users are encouraged to provide Masked Aadhaar (with the first eight digits redacted) wherever permissible under applicable law. Seven Fincorp does not collect, store, or process Aadhaar biometric information under any circumstances.

3. Purposes of Processing & Legal Basis

3.1 Primary Purposes

We process personal data for the following specific purposes, always subject to a valid legal basis:

- **Loan Origination & Servicing:** Processing loan applications, conducting credit assessments, facilitating disbursement, and managing repayments.
- **KYC & Identity Verification:** Verifying your identity and conducting regulatory due diligence as required.
- **Fraud Detection & Prevention:** Detecting, investigating, and preventing fraudulent, deceptive, or unlawful activity.
- **Credit Bureau Access:** Submitting credit enquiries to licensed credit information companies, with your explicit consent.
- **eNACH & Payment Mandate:** Setting up electronic payment mandates for loan repayments, with your consent.
- **Communications:** Sending transactional notifications, repayment reminders, and service announcements.
- **Marketing:** Sending promotional offers and product information, subject to your marketing consent.
- **Legal & Regulatory Compliance:** Meeting obligations under applicable laws and responding to regulatory requests.
- **Platform Analytics & Improvement:** Analysing usage patterns to improve the Platform and personalise the user experience.

3.2 Legal Basis for Processing

We process your personal data on one or more of the following legal bases: (a) your explicit consent; (b) performance of a contract to which you are a party; (c) compliance with a legal obligation; or (d) legitimate interests pursued by us, where such interests are not overridden by your fundamental rights and freedoms.

4. Consent Management & User Rights

4.1 How We Obtain Consent

Seven Fincorp obtains your consent through clear, informed, specific, and unambiguous disclosures presented at appropriate points in your user journey. Consent is never obtained through misleading interfaces, deceptive practices, pre-selected checkboxes, or any form of dark pattern that compromises the genuine and informed nature of consent.

4.2 Purpose-Specific Consent

Separate consent may be obtained for each of the following specific processing activities:

- **KYC Verification:** Identity authentication using government-issued documents.

- Credit Bureau Access: Submission of enquiries to licensed credit information companies.
- eNACH / UPI AutoPay: Registration of electronic payment mandates for loan repayments.
- Marketing Communications: Receipt of promotional content from Seven Fincorp or its partners.
- Lending Partner Sharing: Sharing of application data with the relevant regulated Partner Lender.

4.3 Consent Audit Trail

Records of your consents, OTP verifications, digital acknowledgements, and authorisations provided through the Platform are retained for audit, compliance, dispute resolution, and regulatory purposes. These records are maintained in accordance with our data retention policies and applicable legal requirements.

4.4 Your Rights as Data Principal

Under applicable data protection law, you have the following rights:

- Right to Access: Request a summary of personal data processed by us in relation to you.
- Right to Correction: Request correction of inaccurate or incomplete personal data.
- Right to Erasure: Request deletion of your personal data, subject to legal and regulatory retention requirements.
- Right to Withdraw Consent: Withdraw consent for any specific processing activity at any time.
- Right to Grievance Redressal: Raise complaints regarding the processing of your personal data.
- Right to Nominate: Nominate a representative to exercise your rights in case of death or incapacity.

To exercise any of the above rights, please contact our Data Protection Officer at contact@sevenfincorp.com. We will respond within thirty (30) days of receiving your request.

5. Data Sharing & Third-Party Disclosures

5.1 Partner Lenders

Where you submit a loan application through the Platform, your personal and financial data will be shared with the relevant regulated Partner Lender for credit appraisal, underwriting, disbursement, and loan servicing. The identity of the Partner Lender will be disclosed to you before such sharing occurs and before you submit your application.

5.2 Service Providers

We may engage third-party service providers to assist with the operation of the Platform and delivery of services, including KYC agencies, credit information companies, payment processors, cloud infrastructure providers, and technology service partners. Such providers are contractually bound to maintain data confidentiality and process personal data only as directed by us, consistent with this Policy.

5.3 Legal Disclosures

We may disclose personal data where required to do so by applicable law, court order, or lawful direction of a competent authority. We will endeavour to notify you of any such disclosure to the extent permitted by law.

6. Data Security & Retention

6.1 Security Safeguards

Seven Fincorp employs industry-standard technical and organisational security measures to protect your personal data against unauthorised access, disclosure, alteration, and destruction. Our security controls include:

- Encryption of data in transit using TLS/SSL protocols.
- Encryption of data at rest using AES-256 or equivalent standards.
- Role-based access controls ensuring only authorised personnel access personal data.
- Regular security assessments, vulnerability scanning, and penetration testing.
- Employee training on data protection and information security practices.
- Incident response procedures for timely detection, containment, and reporting of breaches.

6.2 Data Retention

Personal data is retained for as long as necessary to fulfil the purposes for which it was collected, and to satisfy applicable legal, regulatory, accounting, or reporting requirements. After the applicable retention period, personal data is securely deleted, anonymised, or de-identified in accordance with our data retention policy.

7. International Transfers

Currently, Seven Fincorp stores and processes personal data within the Republic of India. Should any cross-border transfer of personal data become necessary, such transfers shall be conducted in accordance with applicable data protection laws, including any requirements relating to adequacy decisions or appropriate safeguards.

8. Cookies & Tracking Technologies

The Platform may use cookies, web beacons, and similar tracking technologies to enhance your experience, analyse usage patterns, and support functionality. You may manage cookie preferences through your browser settings, though disabling certain cookies may affect Platform functionality. For more details, please refer to our Cookie Policy published on the Platform.

9. Children's Privacy

The Platform is not intended for individuals under 18 years of age. We do not knowingly collect personal data from minors. If we become aware that personal data of a minor has been collected without appropriate consent, we will take immediate steps to delete such data from our records.

10. Updates to This Policy

Seven Fincorp reserves the right to update or modify this Privacy Policy at any time to reflect changes in our data practices, regulatory requirements, or service offerings. Material changes will be communicated to you by posting the updated Policy on the Platform with a revised effective date. Your continued use of the Platform following such notification shall constitute your acceptance of the revised Policy.

We recommend that you periodically review this Policy to stay informed of how we are protecting your personal data.

11. Data Protection Officer & Contact

For any questions, concerns, requests, or complaints regarding this Privacy Policy or the processing of your personal data, please contact our Data Protection Officer:

Data Protection Officer — Seven Fincorp

Designation	Data Protection Officer
Company	Noxven Ventures (OPC) Private Limited (Brand: Seven Fincorp / 7fin)
Email Address	contact@sevenfincorp.com
Response SLA	Acknowledgement: 48 hours Resolution: 30 days

You also have the right to lodge a complaint with the relevant data protection authority under applicable law if you believe your rights under applicable data protection legislation have not been adequately addressed.