

**NAVI FINSERV LIMITED
HOME LOAN PRIVACY POLICY**

PLEASE READ THIS POLICY CAREFULLY BEFORE ACCESSING THE WEBSITE OR USING THE APP

The privacy policy ("**Navi Finserv Home Loan Privacy Policy**" or "**Policy**") explains how Navi Finserv Limited (formerly known as Navi Finserv Private Limited and Chaitanya Rural Intermediation Development Services Private Limited) ("**our**", "**us**", "**we**", "**Company**"), collect, store, use, transfer and otherwise process your personal data, for providing you the Navi Finserv Home Loan Services (defined in the Navi Finserv Home Loan Terms of Use ("**Terms**")) through the Navi Finserv mobile application ("**Home Loan App**", "**App**") or website (<https://navi.com/finserv>).

We may revise this Policy as well as update the Navi Finserv Home Loan Services from time to time, so please keep visiting this page regularly to take notice of any changes we make. If you do not agree with any part of this Policy, please stop using our Navi Finserv Home Loan Services immediately.

This Policy, incorporates, and includes our Navi Finserv Home Loan Terms of Use available [here](#) and the agreement(s) executed by you (and co-applicants, members, nominees, if any) for availing the Navi Finserv Home Loan Services made available by us ("**User Loan Agreement**").

Words and phrases not defined in this Policy shall mean the same as provided in the Terms. All references to you (as a user / visitor) shall include reference to all co-applicants, if any.

1. CONTACT INFORMATION:

Summary: You may reach out to the grievance officer, Mohammed Jaffer Sadiq at: grievance@navi.com, confidentially to enquire about the treatment of your data.

If you have any queries, concerns, or grievances regarding this Policy, or the processing of your information, you may please write to our grievance redressal officer, Mohammed Jaffer Sadiq at: grievance@navi.com. You can contact the officer confidentially by email about the treatment of your data by us.

2. WHAT DATA IS COLLECTED?

Summary: We collect certain information provided by you, some of which is sensitive personal information. We have detailed what data and the manner in which this data is collected.

By accepting this Policy, accessing or using Navi Finserv Home Loan Services, you consent to providing us with your prior and explicit consent, your data in the ways listed below. We collect the data you provide to ensure that you are provided with the Navi Finserv Home Loan Services in the best manner possible. We use this data to underwrite (i.e., assess the risk it will be taking) any loan we might offer you and to determine the rates and tenure for such loans. The data being asked from you helps us to

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provide Navi Finserv Home Loan Services to you in a robust and user-friendly manner. We have detailed the manner in which we collect data below:

S. No.	Means of Gathering Data	Data Collected
i.	Data collected to avail Navi Finserv Home Loan Services	<p><u>Navi Home Loan Account Data:</u> We collect the data you provide to us when you apply for a loan on the Home Loan App, including any updates to the data provided. This information is required as part of the registration process to access our service and it is also used to auto populate relevant fields in the course of the interface of the Home Loan App. This includes your name, phone number, email ID, PAN, date of birth, pin code. We may require you to share further information on a later date to confirm the veracity of your information or pursuant to any additional features added to the Home Loan App.</p> <p><i>How we use this data: See, For Enabling the Home Loan App and Navi Finserv Home Loan Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For Enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements.</i></p> <p><u>Financial and KYC Information:</u> We collect the data you provide when you accept the tentative terms of the loans. This includes your photograph, Aadhaar Number, PAN, parents' names, pin code, bank account number, IFSC, proof of address (which can be your electricity bill, rental/lease agreement, gas bill, passport or driver's license, or voter's identity card or any other document the Home Loan App may be able to record).</p> <p>We also seek permission to access geolocation, microphone and camera from your mobile phone device for the purposes of KYC authentication and onboarding.</p> <p><i>How we use this data: See, For Enabling the Home Loan App and Navi Finserv Home Loan Services; For</i></p>

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		<p><i>Loan Processing and KYC Authentication; For Legal Compliance and Requirements.</i></p> <p><u>Economic Profile/ other data for processing loan:</u> You may be required to provide further information to us for the purposes of processing your loan application. Such additional information may include (without limitation) bank statements, nature of employment, official employment email address and name of employer, monthly income, marital status and relationship with the co-applicant (in case the loan is being sought by more than a single applicant), goods and services tax returns, salary and income statements, cost sheet and title documents and other relevant details for the property being financed. You may also be required to provide this information to us via physical documents, e-mail or other digital and offline methods.</p> <p><i>How we use this data: See, For Enabling the Home Loan App and Navi Finserv Home Loan Services; For Loan Processing and KYC Authentication; For assessing the quantum and interest rate of loan to be extended; For Legal Compliance and Requirements.</i></p> <p><u>Transaction information:</u> We collect transaction information related to the use of Navi Finserv Home Loan Services, including the type of Navi Finserv Home Loan Services requested, date and time the Service was provided, loan availed, interest payable, EMI selected, and payment method.</p> <p><i>How we use this data: See, For Enabling the Home Loan App and Navi Finserv Home Loan Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For Enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements.</i></p>
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ii.	Data we collect from your usage of Navi Finserv Home Loan Services	<p><u>Usage data:</u> We collect data about how you interact with Navi Finserv Home Loan Services. This includes data such as interaction patterns (such as screen actions, gestures: taps, scrolls) access dates and times, Home Loan App features or pages viewed, Home Loan App crashes and other system activity, type of browser, and third – party sites or services used before or in the course of interacting with the Navi Finserv Home Loan Services.</p> <p><i>How we use the this data: See, For Enabling the Home Loan App and Navi Finserv Home Loan Services; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For Enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements.</i></p>
iii.	Information we receive from other sources	<p><u>Storage:</u> This permission is required so that users’ documents can be securely downloaded and saved on users’ phones and upload the right documents for a faster approval and disbursal of the loan. This helps provide a very smooth and seamless experience while using the Home Loan App.</p> <p>We may also be working closely with third parties (including, for example, our affiliates, credit information bureaus, business partners, partner banks and financial institutions, technical sub-contractors, analytics providers, search information providers, title deeds, property verification service providers and valuers) and may lawfully receive information about you and your co-applicant from such sources. Such data may be shared internally and combined with data collected on the Home Loan App. By availing Navi Finserv Home Loan Services or setting up a Navi Home Loan Account (as defined in the Terms), you hereby consent to us accessing your credit information from credit information companies to make personalized product offerings to you. We may also use the content you have shared publicly, including on third party platforms or applications,</p>

		<p>to promote Navi Finserv Home Loan Services (including by quoting your content, reviews and/or recommendations, or displaying screenshots of your content, reviews and/or recommendations).</p> <p>To allow you a seamless experience on the Home Loan App and avoid asking you to re-enter your information, we may, with your consent, collect your information from our Affiliates, in accordance with applicable laws. This may include data from Navi Technologies Limited and the Navi App, which is necessary for providing you with the Navi Finserv Home Loan Services, for instance, your account data to auto-fill your details on the Home Loan App or data about phone book contacts, financial SMS data, app data, location, etc., for underwriting. For more details about the information collected by our Affiliates, please refer to the Navi Privacy Policy.</p> <p><i>How we use this data: See, For Enabling the Home Loan App and Navi Finserv Home Loan Services; For Loan Processing and KYC Authentication; For Enabling Customer Support; For Research and Development; For Enabling Communications Between You and Us; For enabling Marketing and Outreach; For Automated Decisions; For Legal Compliance and Requirements.</i></p>
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3. HOW AND WHY IS THE COLLECTED DATA USED?

Summary: We collect and use data collected from you to ensure that the Navi Finserv Home Loan Services are as up-to-date as possible and provided in the most optimal manner to you.

The data that is collected in accordance with Paragraph 2 of the Policy will be used in the manner detailed below:

S. No.	Reason of Use	Manner of Use
i.	For Enabling the Home Loan App and Navi Finserv Home Loan Services	<p>We use the data collected to personalize, maintain and improve Navi Finserv Home Loan Services.</p> <p>This includes using the data to:</p>

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ii.	For Loan Processing and KYC Authentication	<ul style="list-style-type: none"> • Create and update the Navi Home Loan Account. • Analyze your loan eligibility and estimate your loan terms. • Track the disbursement and repayment of the loan. • Enable features that allow you to add and remove bank accounts for your loan repayment and disbursements from time to time. • Enable features that help you check your loan history, credit scores (as provided on government databases), and other such Home Loan App features as may be added from time to time. • Perform internal operations necessary to provide Navi Finserv Home Loan Services, including to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends. <p>We use the data to analyze your creditworthiness, loan eligibility, KYC documents, current employment verification and the terms of your loans. We are required to individually process the loan requests and verify the KYC documentation received. Failing to process such data means that you cannot be provided any loans. For this purpose, you hereby consent to voluntarily submit KYC documents, including Aadhaar related documents in the manner required by us and as issued by the Unique Identification Authority of India (“UIDAI”). You hereby grant us explicit consent to fetch your KYC (Know Your Customer) details from the Central KYC Records Registry using the details provided by you. We also use the data to track disbursement and repayment of your loan.</p>
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ii.	For Enabling Customer Support	<p>We or our lending service providers use the information to provide customer support, including to resolve your concerns from the use of the Navi Finserv Home Loan Services, and train customer service executives.</p> <p>We may use the data so collected for research, analysis, and product development to improve the UI/UX experience- all of which will ultimately improve how you experience the Home Loan App. This also helps us develop automated actions to be triggered in certain events, such as to identify if photographs uploaded are not clear, fraud takes place, IFSC is incorrect etc.</p> <p>We may add features that allow you to call us (through the Home Loan App or otherwise), similarly, we may also need to contact you, through the Home Loan App or other channels like SMS, email, post, etc.</p>
iii.	For Research and Development	
iv.	For Enabling Communications Between You and Us	<p>We may use the data collected to market the Home Loan App and Navi Finserv Home Loan Services. This includes sharing your feedback, ratings and screen names for purely promotion and marketing purposes. Such promotion and marketing may be done via hoardings, banners, pamphlets, calls, SMSes, emails and other means. Even if your name appears in the Do Not Call or Do Not Disturb Register, we may contact you through e-mails, telephones, messages, SMS, WhatsApp or any other available modes for marketing schemes, various financial or investment products or any other aspect pertaining to any loan availed by you. You acknowledge that (i) such communication will not cause any inconvenience to you; (ii) for any claim against or by any third parties, we will not be liable.</p> <p>The Home Loan App may provide automated features for customer responses, reimbursement tracking, etc. As the Home Loan App grows, we</p>
v.	For Marketing and Outreach	

vi.	For Automated Decisions	will keep adding more automated features to the Home Loan App. We may use the data we collect to investigate or address claims or disputes relating to use of Navi Finserv Home Loan Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.
vii.	For Legal Compliance and Requirements	We may use the data collected to offer new products and services for your use.
viii.	For Product Innovation	

4. HOW DO WE SHARE THE COLLECTED INFORMATION?

Summary: Please note that while none of your data is sold, it is shared with third parties for providing you with the Navi Finserv Home Loan Services.

We are very protective about your data. We may share your data with third parties for the following purposes:

- (a) **Third Party Service Providers:** We may share your data with third party service providers, on a need-to-know basis, to provide you with the Navi Finserv Home Loan Services, to make new product offerings to you, and the Home Loan App, including for:
- Analysing transaction behaviour and cashflows through your bank statements, goods and services tax returns, salary and income statements, income tax returns, basis which your loan offer is generated.
 - Validating and authenticating the official verification documents provided by you.
 - Validating your preferred bank account, as well as transferring the loan amounts to you.

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- E-signing of the User Loan Agreement or Sanction Letter, populating the User Loan Agreement or the Sanction Letter. The information shared with these service providers is retained for auditing of the agreements.
- Assisting us with servicing, monitoring or recovery of loan or managing any post-purchase activity of the borrower.
- eNACH/NACH set-up to enable autopay.
- Analyzing customer behaviour, conducting research into customer behaviour and contacting the customers for the said purpose and to automate our marketing and outreach efforts.
- Developing and maintaining core systems.
- Detecting and flagging of fraud.
- Availing cloud services.
- Availing data and analytics services
- Gathering of additional information regarding your bank account and statement details, in case adequate information has not been provided by you or through the other service providers we work with.
- Manually collecting any sums owed by you to us.
- Validating and authenticating your employment status, employment information and employment duration.
- Availing cyber-security and disaster recovery services.

Details of the third parties we share your personal information with are set out below:

Sl. No.	Vendor's Entity Name	Address	Email ID
1	Hyperverge, Inc.	104 1st Street, Los Altos, CA 94022	contact@hyperverge.co
2	Fintech Products And Solutions India Pvt Ltd	10-2-289/71, Krishna Doyen # 501, Shantinagar, Hyderabad - 500028, India	info@onemoney.in
3	TSS Consultancy Private Limited	602/603, Trade Link, E Wing, A Block, Kamala Mills Compound, Lower Parel, Mumbai - 400013	sales@tssconsultancy.com
4	Karza Technologies Private Limited	3rd Floor, Birla Centurion, Century Mill Compound, Lower Patel, Mumbai, Maharastra, - 400013	connect@karza.in
5	Digitap.Ai Enterprise Solutions Private Limited	Novel MSR Park, 5th Floor, K. No. 731/2389, 93/9, Varthur Main Rd, Marathahalli, Bangalore - 560037	nageen.kommu@digitap.ai

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6	Digitech Solutions Private Limited	Flat C-1603, Oak Block, Salarpuria Greenage Apts Bomanhalli, Hosur Main Road, Bangalore - 560068. Ka	support@digio.in
7	Razorpay Software Private Limited	1st Floor, SJR Cyber, 22 Laskar Hosur Road, Adugodi, Bengaluru, 560030, Karnataka, India	disclosures@razorpay.com
8	ICICI Bank Limited	Icici Bank Tower, Near Chakli Circle, Old Padra Road, Vadodara 390007, Gujarat, India.	Customer.care@icicibank.com
9	Yes Bank Limited	Yes Bank House, Off Western Express Highway, Santacruz (East), Mumbai - 400055	yestouch@yesbank.in
10	Gupshup Technology (India) Private Limited	Eastland Citadel, #150/1, Ground Floor, Hosur Main Road, Kaveri Layout, S.G. Palya, Koramangala, Bengaluru, Karnataka- 560029, India	enterprise-support@gupshup.io
11	Kaleyra, Inc.	The Pavilion, 1st Floor, #175 & 176, BG Road, JP Nagar 4th Phase, Bilekahalli, Bengaluru, KA - 560076	support@kaleyra.com
12	Moengage India Private Limited	1st Floor, #32, Salarpuria Tower II, Chikku Lakshmaiah Layout, Luskar Hosur Road, Koramangala, Bangalore - 560029, India	hello@moengage.com
13	Bharti Airtel Limited	Airtel Centre, Plot No. 16, Udyog Vihar, Phase-Iv, Gurgaon, Haryana, 122015	Content.Grievance@airtel.com
14	Vodafone Idea Limited	Suman Towers, Plot No.18, Sector 11, Gandhinagar -	support@vilpower.in

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		382011, Gujarat. T: +91-79 6671 4000, F: +91-79 2323 2251	
15	Exotel Techcom Pvt. Ltd	#22, Exotel Techcom, Near RMZ Millenia, Kensington Road, Ulsoor, Bengaluru, Karnataka, India – 560008	hello@exotel.in
16	Transunion CIBIL Limited	One World Centre, Tower 2A, 19th Floor, Senapati Bapat Marg, Elphinstone Road, Mumbai - 400013.	info@cibil.com
17	Crif High Mark Credit Information Services Pvt. Ltd	3B-01,02, 03, 3rd Floor Phoenix Paragon Plaza (Phoenix Market City Campus), CRIF High Mark Credit Information Service Pvt. Ltd. CTS No. 124/B, 15, L.B.S. Marg, Kurla (West), Mumbai-400070. India	info@crifhighmark.com
18	Perfios Software Solutions Pvt. Ltd	No.66/5-25, 5th Floor, IndiqubeHm Vibha Building Lasker Hosur Road, Above Star Bazar, Adugodi, Bangalore - 560030 Ka. In	info@perfios.com
19	Baldor Technologies Private Limited	4-F, Rushabh Chambers, Plot No. 609, Off Makwana Road, Marol Naka, Andheri - East Mumbai Mumbai City Mh - 400059 In	finance@idfy.com
20	Finarkein Analytics Private Limited	FL-B-1002, Marvel Albero, SN41/3/1/1 TO 6 Kondhwa BK., Pune- 411048	hello@finarkein.com
21	Navi Technologies Limited	9th Floor, Vaishnavi Tech Square, Iballur Village, Begur Hobli, Bengaluru, Karnataka 560102	help@navi.com
22	Kaleyra, Inc.	The Pavilion, 1st Floor, #175 & 176, BG Road, JP Nagar 4th Phase, Bilekahalli, Bengaluru, KA - 560076	support@kaleyra.com
23	Karix Mobile Private Limited	A Wing, 3rd Floor, Prism Towers, Mind Space, Malad (W), Mumbai-400064 India	support@kaleyra.com

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24	Iron Mountain India Private Limited	302, B-Wing, 3rd Floor, Times Square, Andheri East, 400059 Mumbai	steffi.willson.contr@ironmountain.com

- (b) **Affiliates and Group Companies:** Subject to applicable law, we may share any data we have collected or collect from you with our affiliates and group companies, including for product research and development, advertising relevant products to you, and to tailor the products for your benefit.
- (c) **Third-Party Services:** The Home Loan App may allow you to connect with other websites, products, or services that we don't have control over (for example, if we allow you to pay through an external wallet facility then we will have to share your usage information with the facility provider). However, usage of such third-party services is subject to their privacy policies and not within our control. We recommend that you have a look at their privacy policies before agreeing to use their services.

[Link to Third-Party SDK](#)

The Home Loan App might also contain links to a registered third-party SDK which collects data on our behalf and data is stored to a secured server to perform a credit risk assessment. We ensure that our third party service provider(s) take security measures in order to protect your personal information against loss, misuse or alternation of the data. Our third-party service provider(s) employ separation of environments and segregation of duties and has strict role-based access control on a documented, need-to-use basis. The stored data is protected and stored by application-level encryption. They enforce key management services to limit access to data. Furthermore, our registered third-party service provider(s) provide hosting security – they use industry-leading anti-virus, anti-malware, intrusion prevention systems, intrusion detection systems, file integrity monitoring, and application control solutions.

- (d) **Law enforcement:** If any governmental authority or law enforcement officers request or require any information and we think disclosure is required or appropriate in order to comply with laws, regulations, or a legal process, we may share such required information with the governmental authority or law enforcement officers.
- (e) **Change in Control:** While negotiating or in relation to a change of corporate control such as a restructuring, merger or sale of our assets, we may have to disclose our databases and information we have stored in the course of our operations.

5. WHAT ARE YOUR RIGHTS REGARDING THE DATA?

Summary: We have identified your rights in the table below and the manner in which you may exercise these rights.

It is important for us that you remain in control of your data. Please write to us at help@navi.com if you wish to exercise any of your rights under the Policy. You shall have the following rights:

S. No.	Your Right	Details
i.	Right to rectification	In the event that any personal information provided by you is inaccurate, incomplete or outdated then you shall have the right to provide us with the accurate, complete and up to date data and have us rectify such data. It may take up to 10 days to process your request. We urge you to ensure that you always provide us with accurate and correct information/data to ensure your use of Navi Finserv Home Loan Services is uninterrupted.
ii.	Right to withdraw consent	<p>You have the right to withdraw your consent to the use, disclosure or retention of your data, in accordance with applicable laws. If you choose to deny or withdraw consent, we may not be able to offer you access to or use of the Home Loan App or the Navi Finserv Home Loan Services. And in such case, we may have to stop providing you with access to or enable the use of the Home Loan App or the Navi Finserv Home Loan Services.</p> <p>However, if you have availed any loans from us, we will have a limited right to continue processing your information, until such loan has been repaid in full, along with any interest and dues payable. We will not retain your data and information if it is no longer required by us and there is no legal requirement to retain the same.</p>
iii.	Right to opt-out	You can opt out of receiving push notifications through your device settings. Please note that opting out of receiving push notifications may impact your use of the Home Loan App.

6. WHAT IS OUR DATA SECURITY PRACTICE?

Summary: We aspire to keep your data and information as secure as possible and to that effect we have used state of the art software.

We use requisite technical and organizational security measures to ensure a level of protection for personal information appropriate to the nature, scope and purpose of processing personal data, the

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risks associated with such processing, and the likelihood and severity of the harm that may result from such processing. The transfer of personal information between your end device and us is generally carried out via best-in-class encryption protocols. If you communicate with us by e-mail, access by third parties cannot be ruled out. In the case of confidential information, you may choose to use alternative communication channels, such as post or encrypted e-mail communication (PGP).

7. HOW DO WE HANDLE INFORMATION SECURITY BREACHES?

We have an Information Security Incident Management Policy in place to tackle incidents of information security breach. This process enables the incident response team to detect, analyse, contain, eradicate and recover from information security breach incidents.

8. CONSENT MECHANISM

Summary: By applying for a loan, you have consented to all our data privacy practices. You can write to help@navi.com if you wish to revoke any consent.

You consent to our processing of your data, including personal information, in accordance with this Policy, by browsing or accessing the Website or by checking the check box presented with this Policy, on the Home Loan App. To take your prior and explicit consent, we will provide you with appropriate options with the Home Loan App, to give or deny the consent for the use of data, to permit disclosures to third parties, to retain data, etc, as per the applicable law. We will also disclose the purpose of obtaining your consent at appropriate stages of interface within the Home Loan App. By providing your explicit consent, you agree to service provider's processing, storage, usage, and sharing of the data provided by you pursuant to this Policy.

If you do not agree with any of the terms of this Policy or the Terms or wish to revoke any consent you have provided to us, please write to us at help@navi.com. However, we may continue to retain data attributes that are necessary to be retained under applicable laws or for our underwriting checks, fraud detection and prevention, reporting purposes or dispute management. In addition, please note that if you revoke any mandatory permissions or revoke the consent to process and store information such as your Navi Home Loan Account Data, Financial and KYC Information and/or any other information needed to facilitate your loan amounts, then we may have to cease the provision, access or use of Navi Finserv Home Loan Services or the Home Loan App to you. We cannot delete your data and you cannot withdraw your mandatory consents if you have availed a loan from us till you have repaid the loan amount and all related charges in its entirety.

9. DATA RETENTION

Summary: We retain your personal information to the extent we need to. Once the need for the retention expires, we will not hold onto it.

We do not retain your personal information for longer than required for the purpose for which the information may be lawfully used. We store your personally identifiable data in our servers in

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encrypted form. For any other information, we may entertain your request for deletion, in accordance with paragraph 8 above.

10. CHILDREN'S PRIVACY

Navi Finserv Home Loan Services are not directed to children, and we do not knowingly solicit or collect personal information from persons under the age of 18 (eighteen). If we find out that a child has given us personal information, we will take steps to delete that information and terminate the relevant Navi Home Loan Account.

11. COMMUNICATIONS FROM US

We may from time to time contact you via calls, SMS, emails, and other communication channels to provide you with information pertaining to Navi Finserv Home Loan Services, notifications on updates vis-à-vis Navi Finserv Home Loan Services (when we consider it necessary to do so), educational information and promotions. We may also notify you if we need to temporarily suspend the Home Loan App for maintenance, and keep you informed on security, privacy, or administrative-related communications. By setting up an account with us, you consent to us contacting you via call, SMS, push notifications, or any other communication channel, as we may deem fit.

12. UPDATES TO THIS NOTICE

We may occasionally update this Policy. Use of Navi Finserv Home Loan Services after an update constitutes consent to the updated notice to the extent permitted by law. Please take the time to periodically review this Policy for the latest information on our privacy practices.