



***Oxyzo Financial Service Limited***  
***Privacy Policy***  
***Version – 2.0***

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**REVIEW & APPROVING AUTHORITY**

Authority	Designation
Prepared By	
Reviewed by	
Approved By	

**VERSION HISTORY**

Version	Issue Date	Brief Description
1.0	18-07-2023	Created by the name Privacy Policy and Reviewed by Operational Committee
1.0	22-07-2023	Noted by Board of Directors
2.0	3-10-2025	Updated as per DPDPA 2023

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## 1. Introduction

This Privacy Policy (hereinafter, "Policy") covers the Personal Data (also known as Personal Data) that Oxyzo Financial Services Limited, its subsidiaries, and affiliates (hereinafter, "Company", "we", "our", or "us") may collect, store, use, disclose and otherwise process about you, as well as the rights available to you when Company acts as the Controller for such Personal Data.

This Policy does not apply where Company processes Personal Data as a Processor (also known as a service provider) during the provision of our products, platform, or services (the 'Services') to our customers, solely for their benefit. In this case, any Personal Data uploaded into Services by the Customer would be considered 'Customer Content' and would be processed in accordance with an agreement and Data Processing Addendums ('Agreement').

We are committed to safeguarding the privacy and security of your Personal Data processed in furtherance of sites and applications under our control that post a link to this Policy associated with <https://www.oxyzo.in/> (hereinafter, "the website").

## 2. Personal Data We Collect

We may collect your Personal Information when you use our services or Platform or otherwise interact with us during the course of our relationship. We collect Personal Information which is relevant and absolutely necessary for providing the services requested by you and to continually improve our Platform.

We collect personal data necessary to provide our Services, enhance user experience, and comply with legal obligations. The types of data include:

S.No.	Personal Data Attributes	Purpose Of Processing
1.	Full Name	Name of the user is collected for identification and provide the services offered by us.
2.	Phone Number	Phone number of the user is collected to create an account and establish the unique id. It is also used to carry out communications with the user and send promotional communications.
3.	Email Address	Email address is utilised to setup a secondary channel of communication with the user and for sending promotional communication.
4.	Gender	Gender of the user is collected to provide user with customised services and offers.
5.	Correspondence Address	Correspondence address is collected for sending communications and as an Address proof for regulatory compliance.

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6.	<i>Geo Location</i>	<i>Location of the user is collected to provide then with area-based offers and to enhance our services.</i>
7.	<i>Date of Birth</i>	<i>Date of birth is collected to establish eligibility for loan and personalized offers.</i>
8.	<i>PAN Card</i>	<i>Pan Card is collected for KYC Compliance requirement and to verify the Identity of the user.</i>
9.	<i>Aadhar Card/ Number</i>	<i>Aadhar Card is collected for KYC Compliance requirement and to verify the Identity of the user.</i>
10.	<i>Voter ID Card</i>	<i>Voter ID Card is collected as a supporting document for KYC Compliance and to verify the Identity of the user.</i>
11.	<i>Driving License</i>	<i>Driving License is collected as a supporting document for KYC Compliance and to verify the Identity of the user.</i>
12.	<i>Income Details</i>	<i>Income details are collected to check the financial capability of the user to access the eligibility for loan.</i>
13.	<i>Business Details</i>	<i>Business details are collected to check the financial capability of the entity to access the eligibility for loan.</i>
14.	<i>Bank Details</i>	<i>Business details are collected to check the financial capability of the entity to access the eligibility for loan.</i>
15.	<i>OTPs</i>	<i>For Sim binding and Aadhar verification for regulatory compliance</i>
16.	<i>Data available with Public Sources</i>	<i>Information from public sources, credit reference agencies, or service providers (e.g., credit history, Criminal Records etc.) for Risk Analysis.</i>
17.	<i>Any Other document as and when mandated by Regulatory Authorities</i>	<i>Additional documents may be collected as and when required to comply with any applicable regulatory compliance.</i>
18.	<i>Device Information</i>	<i>IP address, device identifier, browser type, operating system, and plug-ins are collected to enhance service experience.</i>

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19.	<i>Cookies and Tracking data</i>	<i>Collected via cookies, web beacons, pixels, and tags to analyze usage and personalize content.</i>
20.	<i>Other</i>	<i>Any other information that you may provide us for enhancing our services.</i>

### 3. How We Use Your Personal Data and on What Grounds

We may use your Personal Data for the following purposes, relying on one or more legal bases as permitted under applicable Data Protection Laws:

Purpose	Legal Basis
<b>1. Service Delivery</b>	
<ul style="list-style-type: none"> <li>To provide the services you request.</li> <li>To evaluate and process queries, product, or service requests.</li> <li>To deliver subscription-based services, updates, and related communications.</li> <li>To process orders, payments, and transactions as part of our service delivery.</li> </ul>	Performance of a contract (e.g. Service Agreement)/ Your consent/ Our legitimate interests in fulfilling service obligations.
<b>2. Access and Administration</b>	
<ul style="list-style-type: none"> <li>To grant access to marketing materials, internal systems, or network services where applicable.</li> <li>To manage client communications, service delivery, billing, and general administration tasks.</li> <li>To authenticate users and manage access control to various services and resources</li> </ul>	Our legitimate interests in managing service access and maintaining efficient operations.
<b>3. Marketing and Business Development</b>	
<ul style="list-style-type: none"> <li>To run marketing campaigns, promotions, and special offers to raise brand awareness.</li> <li>To personalize marketing content based on your interests or engagement history.</li> <li>To analyse user behaviour and feedback to improve our products, services, and customer relations.</li> <li>To send you communications aligned with your stated preferences and applicable regulations.</li> </ul>	Your consent (e.g., when signing up for marketing communications or events)/ Our legitimate interests in promoting and developing our business (e.g., contacting you regarding related services following a demo or purchase).

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<ul style="list-style-type: none"> <li>• To fulfil contractual obligations or agreements related to services, products, and communications.</li> <li>• To establish and manage business relationships with partners, affiliates, and vendors.</li> </ul>	
<b>4. Legal Compliance</b>	
<ul style="list-style-type: none"> <li>• To comply with applicable Data Protection Laws, regulations, and legal obligations.</li> <li>• To protect the safety, rights, property, and security of Company, our customers, or the public,</li> <li>• To prevent fraud and ensure the security of our systems.</li> <li>• To resolve disputes, enforce agreements, and defend against legal claims.</li> </ul>	Legal obligations/ Our legitimate interests in legal protection and risk management.
<b>5. Business Operations</b>	
<ul style="list-style-type: none"> <li>• For internal administrative, operational and audit purposes,</li> <li>• To perform corporate governance functions, such as financial reporting, tax filings, and compliance checks.</li> <li>• To facilitate business transfers, mergers, acquisitions, or joint ventures, where Personal Data may be transferred as part of the transaction.</li> </ul>	Our legitimate interests in effective corporate management/ Legal obligations.
<b>6. Customer Support and Service Improvement</b>	
<ul style="list-style-type: none"> <li>• To provide technical and customer support.</li> <li>• To respond to inquiries, resolve issues or manage complaints.</li> <li>• To collect feedback to enhance our products and services.</li> </ul>	Your consent (e.g., for voluntary feedback)/ Our legitimate interests in providing responsive and efficient customer service.
<b>7. Security and Fraud Prevention</b>	
<ul style="list-style-type: none"> <li>• To protect our systems, infrastructure and data from unauthorized access or malicious threats.</li> <li>• To monitor and detect fraudulent activity, identity theft, or data breaches.</li> <li>• To ensure the integrity of transactions and communications.</li> </ul>	Our legitimate interests in ensuring information security and system integrity/ Legal obligations.

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## 8. Research and Development

- To conduct market research, customer surveys, and analysis to understand trends and customer preferences.
- To develop innovate and improve the quality, functionality, and features of our products and services.

Your consent (e.g., via cookie preferences, participation in a survey or user research)/  
Our legitimate interests in service optimization and product development.

## 4. How We Disclose/Share Your Personal Data

*We may share your Personal Data with third parties from time to time and only where strictly necessary. All data sharing is carried out in accordance with applicable data protection laws and with appropriate safeguards in place. Please refer to the table below for more details:*

Categories of Recipients	Reason for Sharing
Company Group Companies	To support internal operations, business continuity, and legitimate business interests across Company group entities.
Service Providers and Vendors	To enable the delivery of our services and business operations, including but not limited to: <ul style="list-style-type: none"><li>• Customer support</li><li>• Infrastructure maintenance</li><li>• IT and security services</li></ul>
Marketing and Communication Partners	To facilitate communication of relevant updates, offers, and service-related messages, under strict contractual obligations and confidentiality.
Law enforcement and Regulatory Authorities	To comply with legal obligations or respond to lawful requests (e.g., subpoenas, investigations), and where necessary: <ul style="list-style-type: none"><li>• To protect the safety, rights, or property, including intellectual property, of individuals or Company</li><li>• To support national security or law enforcement efforts</li><li>• To prevent fraud or other illegal activities.</li></ul>
Mergers, Acquisitions, or Business Transfers	In the event of a merger, acquisition, restructuring, or sale of business assets, Personal Data may be shared with the relevant parties, subject to confidentiality and equivalent data protection standards.

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## 5. How Long Do We Store Your Personal Data

We may store your Personal Data for different time periods depending on the category of Personal Data and the nature of relationship that you have with us. Our aim is to retain your Personal Data for the minimal period necessary to achieve the purpose(s) for which such Personal Data was collected. We consider the following criteria when determining how long we will retain your Personal Data:

- Category of Personal Data
- Purpose of processing
- Compliance with legal and contractual obligations
- Legitimate and essential business purposes, such as fraud prevention, product improvement, establishment or defending legal claims, or enforcing our legal rights.

The default retention period is six years from the last processing date, unless otherwise mandated (e.g., 10 years for tax records).

## 6. How Do We Protect Your Personal Data

We use appropriate technical, organizational, and administrative security measures to protect any Personal Data we process and store from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have put various safeguards in place including strong firewalls, encryption, access control, restricted database and retention policies to guard against unauthorized access and unnecessary retention of Personal Data in our systems. In addition, Personal Data stored in our computer systems are secured by physical security measures. For an updated list of all our certifications and security reports, please check out our \_\_\_\_\_

However, no company or service, including Company can guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of your Personal Data at any time.

## 7. Your Privacy Rights and Choices

You may have certain rights related to your Personal Data, depending on your location and the applicable Data Protection Laws. These rights may include, subject to any exceptions or limitations:

Rights	Description
Right to Know	The right to know what Personal Data of you is being collected and for what purpose.
Right to Access	The right to request a copy of your Personal Data.
Right to Rectification	The right to have your Personal Data rectified, corrected, or updated.
Right to Erasure	The right to have your Personal Data deleted, including from any third parties where your Personal Data has been sold, shared, or disclosed.
Right to Restriction of Processing	The right to restrict processing of your Personal Data.
Right to Object	The right to object to the processing of your Personal Data.

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<b>Right against Automated Decision-Making and Profiling</b>	The right to not to be subject to any automated decision making and profiling.
<b>Right to Data Portability</b>	The right to receive your Personal Data in a structured, commonly used and machine-readable format.
<b>Right to Withdraw Consent</b>	The right to withdraw consent at any time (to the extend processing is based on consent). The withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal.
<b>Right To Opt-Out</b>	The right to opt-out of the 'sale' or 'sharing' of your Personal Data.
<b>Right against Discrimination</b>	The right not to be discriminated against for exercising your rights.
<b>Right to Lodge a Complaint</b>	The right to file a complaint with the relevant data protection authority for suspected or actual violations of your privacy rights.

**To exercise any privacy rights available to you, you, or your authorized agent can fill out this Data Principal Right Form.**

*We will ask for written, signed permission that the agent has been authorized to act on your behalf. We will review your privacy rights request and respond to you as quickly as possible, upon verification of your identity and the authorization provided to your agent, in accordance with applicable Data Protection Laws.*

*In the event we are unable to fulfill your request, we will inform you of the reasons for our decision. You also have the right to lodge a complaint with the relevant data protection authority.*

#### **Marketing preferences**

*You may opt out of receiving promotional emails from us by following the instructions in those emails. If you opt out, you may continue to receive Services-related and other non-marketing emails.*

## **8. Data Localisation**

*The Company follows a strict Data Localisation Policy in compliance with the Reserve Bank of India's Master Directions and applicable regulatory requirements. All regulated customer data, financial information, and payment-related data shall be stored, processed, and maintained only within data centers located in India.*

*No cross-border transfer of such data shall be permitted under any circumstance, except where explicitly mandated by Indian law or specifically approved by the Reserve Bank of India. In such rare cases, the Company shall ensure that the transfer does not restrict regulatory or supervisory access by the Reserve Bank of India or other competent authorities.*

*All group entities, service providers, processors, and partners engaged by the Company shall comply with this Data Localisation Policy. The Company shall periodically review and audit third-party arrangements to verify ongoing adherence to this requirement.*

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## 9. Children's Privacy

Our Websites and Services are not directed at children. We do not knowingly collect Personal Data from children under the age of 18 years.

If you are a child, please do not attempt to register for the Services or Events or send any Personal Data about yourself to us. If you believe we have mistakenly or unintentionally collected Personal Data of a child, please contact us by using the information in the 'Contact us' section below and we will take steps to delete their Personal Data in our possession.

## 10. Changes to this Privacy Policy

Please note that this Policy may be subject to change from time to time to keep pace with new technologies, industry practices, and regulatory requirements, among other reasons. The revised policy will accordingly be published on this page: [www.oxyzo.in](http://www.oxyzo.in). Please regularly check this Privacy Policy to ensure you are aware of the latest updates.

This Policy was last updated on \_\_\_\_\_ and it supersedes any and all existing policies on the subject matter.

## 11. Contact Us

For any questions or concerns about this Policy, contact our Grievance Redressal Officer/Data Protection Officer via:

### 1. Grievance Redressal Officer

**Name:** Mr. Abhishek Goyal

**Email:** [grievanceredressal@oxyzo.in](mailto:grievanceredressal@oxyzo.in)

**Phone:** +91-7353013499

**Hours:** 10:30 a.m. to 6:00 p.m., Monday to Friday (except public holidays)

We resolve complaints within 30 days, with identity verification for security.

You may reach out to the Data Protection Board of India in case you are not satisfied with the grievance redressal.

### 2. Data Protection Officer

**Name:**

**Email:**

**Phone:**

**Address:**

The DPO, based in India, responds to requests within 30 days from the receipt of request.

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