

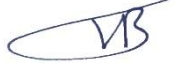





## National Credit Guarantee Trustee Company Ltd

### PrivacyPolicy

**Doc. No.** : NCGTC-ISMS-PL-26  
**Issue No. & Date** : Ver 1.0 & 23-05-2023  
**Classification of Information** : Internal and protected  
**Revision Status** : Ver 1.0

	Name	Designation	Signature	Date
Prepared by	NCGTC Tech Pvt Ltd	Compliance team		19-05-2023
Reviewed by	Murli Kumar Vukanti	Head HR/AGM		22-05-2023
Approved by	Vijayraj Bhosale	CISO		22-05-2023

 एनसीजीटीसी NCGTC	Privacy Policy					
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### Revision Status

Revision	Date	Page No.	Clause No.	Brief Description of Revision
00		All	All	The initial issue to comply with the requirements of ISO 27001:2022.
01		All	All	Minor changes are done in the document.

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Legal action may be taken against any infringement.


#### Errors and Omissions

In case of any errors or omissions are noted in this document, please report same to Chief Information Security Officer (CISO), NCGTC Ltd email id [CISO@NCGTC.in](mailto:CISO@NCGTC.in)

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### 1. Purpose

The purpose of this Policy is to protect personal information (including personally identifiable information or PII), by putting in place appropriate controls across the organization, periodically reviewing them and improving them, as needed.

The organization ensures compliance with the relevant legal requirements and contractual requirements from customers related to privacy.

### 2. Scope

The scope of this policy includes all employees of NCGTC and those of our business associates who have or are responsible for the collection, use, retention, disclosure, and disposal of personal information. Also, this Policy is applicable to personal information and sensitive personal data or information collected by the NCGTC or its affiliates directly from the customer or through the NCGTC's online portals and electronic communications.

### 3. Roles & Responsibilities

<b>Roles</b>	<b>Responsibilities</b>
CISO	<ul style="list-style-type: none"> <li>• Approve all mandatory documents</li> <li>• Approval &amp; communication with Authority.</li> </ul>
Head HR	<ul style="list-style-type: none"> <li>• Document, Communicate, and ensure implementation and maintenance of this policy.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• Shall be aware of the Privacy Policy.</li> <li>• Adhere to this Policy</li> </ul>


### 4. Abbreviations & Definitions

#### 4.1 Abbreviations

<b>Abbreviations</b>	<b>Expansions</b>
NCGTC	National Credit Guarantee Trustee Company Ltd

#### 4.2 Definitions

<b>Terms</b>	<b>Definitions</b>
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"Personal information"	Any information that relates to a natural person, either directly or indirectly, in combination with other information available or likely to be available with the NCGTC, is capable of identifying such a person.

## 5. Forms

Name of the Document	Form No.
NA	

## 6. Policy

NCGTC recognizes the expectations of its customers with regard to privacy, confidentiality and security of their personal information that resides with the organization.


Privacy Policy governs the way in which the organization collects, uses, discloses, stores, secures, and disposes of personal information and sensitive personal data or information residing within the organization

## 7. Information We Collect

We collect only the information needed for legitimate business purposes.

The personal information such as your full name, email ID, contact details, and other essential credit information etc. is captured when an individual or Member Lending Institution who needs to avail our services, sign-ups for an account, registers for an event, or asks for customer support. If services are availed, we may collect the personal information such as full name, email id, contact details, address, designation, fax with other essential credit details from an individual or through Member Lending Institutions..

We may collect personal information directly from publicly available databases, social media sites or in collaboration with our partners from time to time. You may also need to provide some personal information if you wish to explore employment opportunities with us.

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## 8. What we do with your personal information

We do not share or sell your personal information to anyone. We use personal information solely for the purpose of interacting with you and to validate various scheme parameters. We use personal information only for the specific reason for which it is provided.

Some personal information is required:

- To manage, administer and fulfil the obligations under contracts.
- We will only use your personal data for the purposes for which we collect it, we reasonably consider that we need to use it for another reason that is compatible with the original purpose and applicable local law. Any exceptions will be brought to your notice and the legal basis for the same will be explained.

## 9. We will not share your personal information

We do not share your personal data with anyone else and we will never sell personal data. However, exemptions to the above are where NCGTC is asked to provide information because of any legal or regulatory requirements. We will make every effort that such mandated disclosures from the regulatory authorities are communicated to you.

## 10. How long will we keep your personal information?


We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances, we may anonymize your personal data so that it can no longer be directly associated with you.

## 11. How will we keep your information safe?

We are fully committed to information security and compliance with applicable regulations. We have implemented strong security controls for the protection of data. We have designed and implemented an information security program that is being implemented /implemented in line with International Organization for Standardization (ISO) 27001:2022.

Though we take reasonable measures to protect our assets against unauthorized access or attack; the Internet inherently is not fully secure. While we work towards and strive to protect your personal information/privacy, we would like you to take note of the inherent Internet risks

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associated with data transfer and processing. You also need to ensure that your User ID, Password etc. are not disclosed to anyone and that your systems are safe for usage.

At any point, if you suspect any security issues or incidents, or you receive any suspicious mail from someone holding themselves out to be an NCGTC employee or from a fake website claiming to be affiliated with NCGTC, you may reach out to us <https://www.ncgtc.in/>.

## 12. How are cookies used?

A cookie is a small piece of data stored on the user's computer by the web browser while browsing a website. We use cookies to improve the quality of our site and service and to try and make your browsing experience meaningful. Cookies may be used to track how you interact with our sites and to analyze trends. The types of data collected may include IP addresses, cookies identifiers, site activities etc.

We use first-party and third-party cookies for several purposes. First-party cookies are mostly necessary for the website to function the right way.


The third-party cookies used on our websites are used mainly for understanding how the website performs, how you interact with our website, keeping our services secure, providing information that is relevant to you, and all in all providing you with a better and improved user experience.

You can control the use of cookies, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service.

## 13. How to contact us?

If you have a privacy concern, complaint, or question regarding this privacy statement or In order to address any discrepancies or grievances related to the personal information residing with NCGTC, you may visit our website <https://www.ncgtc.in/> .

Upon receiving your request, we will make every effort to fulfil your request, if it is not otherwise required to be treated differently by law or for legitimate business purposes. You must identify yourself prior to making a request; we may not be able to process your request if it is deemed unreasonable or inappropriate.

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We will respond to your queries within a reasonable timeframe. Please note that we may need to maintain residual copies even after your information gets deleted from the active environment (e.g., backup copies or to ensure we don't contact you if you have opted out).

#### 14. Legal Notice

NCGTC may need to disclose personal information to legal authorities for compliance, fraud investigation, statutory purposes or other legal activities as per the local laws and government requests.

#### 15. Changes to this Privacy Statement

This Privacy Policy is effective as of May 23<sup>rd</sup> 2023 and will remain in effect except to any changes in its provisions in the future which will be in effect immediately after being posted on webpage. NCGTC reserves the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

#### 16. Reference Document

- NA

#### 17. Enforcement

All employees, user departments, vendors and third parties shall follow the policy; violation of this could lead to termination of the contract or financial penalties.

#### Document Note

This document of NCGTC confirms to the entire Team of the National Credit Guarantee Trustee Company Ltd and applicable interested parties is stored in the Process Repository, accessible through authorized IDs as approved. Printed or other electronic copies are for information only.

The user is responsible for assuring that he/she always uses the currently valid version at the address mentioned above.

This document ends here.