

# OCS Privacy Policy

## Introduction

- Oneconsumer Services Private Limited (“OCS”) is committed to safeguarding the privacy and confidentiality of your sensitive personal data or information.
- In the process of you using this website i.e., <https://www.onescore.app/> (“Website”) and/or the app ‘OneScore’ (“App”) or availing of the existing or future services or facility provided by the Website and/or the App, you may be required to furnish information, including personal information and/or sensitive personal information and/or any other information that is of a confidential nature. You are urged to keep the information current to ensure that the services and facility remain relevant and enable us to reach you.

## SECTION A: GENERAL PRIVACY POLICY

### Information supplied by you

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- To avail certain services on our App/Website, you are required to provide some personally identifiable information for the registration process, which includes but is not limited to the following:
    - i. Name;
    - ii. Age;
    - iii. Mobile number;
    - iv. Gender;
    - v. Email address;
    - vi. Permanent Account Number (PAN);
    - vii. Date of birth;
    - viii. Address; and
    - ix. CIBIL and Experian bureau data.
  - OCS may require you to provide additional details, as and when required, in order to comply with any applicable regulatory requirement or for additional services/products via the App/Website, as and when offered, and may also utilize data lawfully obtained from third party service providers authorized by you, including but not limited to data pertaining to your credit score, to provide the App services/Website services, subject to the terms of this policy (“Privacy Policy”). We also maintain some records of users (including recordings of customer support calls) who contact us for support, for the purpose of responding to queries or other related activities.

### Express Consent

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- While providing your details/documents via the App/Website, including but not limited to personal information as mentioned above, you expressly consent to OCS (including its marketing channels and business partners) to contact you through SMS, WhatsApp, push notifications, call and/ or e-mail and to follow up calls in relation to the services provided through the App/Website, for imparting product knowledge, offering promotional offers running on the App/Website & various other offers offered by our business partners. The App/Website requires you to provide consent for keying in or uploading your personal information, as may be necessary to process your application. Any personal information which requires to be keyed in or uploaded is required for enabling hassle free, faster and paperless (to the extent possible) processing of applications for financial products so opted/ availed by you.
  - In order to expand the scope of our services, we may from time to time, seek additional information from you. Any such collection of additional information and documents shall be subject to an explicit & purpose specific consent sought from all users.

### Information obtained from Credit Information Companies on your behalf

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- We obtain your Credit Information Aggregates from Credit Information Companies (CICs) on your behalf. Subsequent data is pulled from the CICs during authenticated sessions in the App. By consenting to use and avail your credit information report through us, you agree that OCS shall be entitled to rely on your

authorisation and consent granted by you to us. We may analyse and profile your credit information in order to assist you in being better informed and understand and manage your credit score/rating, identify and inform you of credit products like credit cards, personal loans, etc. that are likely to be suited to your circumstances, to identify whether you may benefit from additional guidance concerning your credit score and steps you can take to improve your score and credit history etc.

### **Information automatically collected while using the app or website**

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- We strive to keep automatically tracked information to a minimum by obtaining little or no permissions from the App/Website. However, we may collect information relating to your use of our App such as your IP address, browser type, mobile operating system, manufacturer and model of your mobile device, access time and time spent. We may also collect information about the screens you view within our App and other actions you take while using our App. We may use third party services for such automatic collection, however no personally identifiable information will be shared with such third parties, unless required under applicable laws.

### **Use of personal Information**

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- We use your Credit Information Aggregates obtained from CICs to present to you an analysis of your credit profile including detailed information, where available. We shall use the Credit Information Aggregates for limited end use consisting of and in relation to the services proposed to be availed by you from us on the App/Website. We shall not transmit, sell or rent the Credit Information Aggregates to any other third party and the same cannot be copied or reproduced other than as agreed herein. Credit Information Aggregates provided to OCS are solely the property of the CICs and you. We may use the information collected for offering some products like credit cards, personal loans etc. and services. However, we do not share any information with third parties for soliciting products and services offered by them. Information automatically tracked while using the App or Website allows us to collect statistics about our App usage and effectiveness, personalise your experience whilst you are on our App, as well as customize our interactions with you and also assisting in expanding the scope of our services.
- We use the information we collect (including recordings of customer support calls) to assist you when you contact our customer support services to investigate and resolve your queries, monitor and improve our customer support responses. We do not share any information with third parties for soliciting products and services offered by them. We may use the information collected for offering various purposes but not limited to following :
  - a. Improve the services offered through the App by sending communications, offer alerts relevant to your use;
  - b. Create and maintain a trusted and safe environment on the App (such as complying with our legal obligations and compliance with our policies);
  - c. Respond to queries or requests submitted by you,
  - d. Anticipate and resolve problems with any services supplied to you;
  - e. Notify you about changes to our services;
  - f. Allow you to participate in interactive features offered through our Services; and
  - g. For any other purpose with your consent.
- Any information provided by you will be used for creating and updating your account and for providing you products and services or for any other purposes for which you have granted access to such information to us, based on your interaction with the App/Website.
- We may also use the information collected to perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing and research and to monitor and analyse usage and activity trends. We process this personal information for these purposes given our legitimate interest in improving the services.

### **Information Sharing**

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- Subject to explicit and prior consent from you, we may share your information with the following service providers, in order to provide you the services:

- a) FPL Technologies Private Limited, as our technology service provider;
- b) Experian Credit Information Company of India Private Limited; and
- c) TransUnion CIBIL Limited.

- Subject to explicit and prior consent from you, we may use information created by your use of our App/Website, not including information collected from other sources such as e-mails etc. for marketing purposes. This consent is purely voluntary and you may at any time choose not to receive marketing materials from us by following the unsubscribe instructions included in each e-mail you may receive, by indicating so when we call you, or by contacting us directly. Further, if you want to remove your contact information from all our lists and newsletters, please click on the unsubscribe button on the emailers or send an email request to [score.privacy@onescore.app](mailto:score.privacy@onescore.app).
- Subject to explicit and prior consent from you, we may disclose certain information that is created by your use of our App/Website to OCS' subsidiaries, affiliate entities and partners that are not acting as our suppliers or business partners. For the sake of clarity, we do not sell or lease such information.
- We may display third party online advertisements (advertising ID) on the Website/App. We may also advertise our activities and organizational goals on other websites/apps. We may collaborate with other website/app operators as well as network advertisers to do so. We request you to read and understand such concerned third party privacy policies to understand their practices relating to advertising, including what type of information they may collect about your internet usage. No personally identifiable information is shared with any third party online advertiser or website or app as part of any such activity. We do not provide any information relating to your usage to such website operators or network advertisers.
- During your use of the App/Website, you may come across links to third party websites/apps that are not affiliated with OCS. OCS is not responsible for the privacy practices or the content of those other websites, or for any acts/ omissions by such third parties in the course of your transaction with them.
- Except as expressly stated in this Privacy Policy, we do not share any of your personal information with any third parties, unless when it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including cyber incidents, or for prosecution and punishment of offences.

### **Information Security**

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- We take appropriate security measures to protect against unauthorised access. These include internal reviews of our data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorised access to systems where we store personal data. All information gathered on our App is securely stored within a controlled database within servers located in India. Access to the servers is password-protected and is strictly limited.
- We are ISO/IEC 27001:2013 certified company which means we have implemented applicable industry standard security controls that helps us protect all our customer's data in a highly secure manner.
- We are committed about our customer's data and privacy. We blend security at multiple steps within our products with state of the art technology to ensure our systems maintain strong security measures. The overall data and privacy security design allows us defend our systems ranging from low hanging issue up to sophisticated attacks.

### **Opt-Out**

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- If you are no longer interested in sharing your personal information, please e-mail your request at: [score.privacy@onescore.app](mailto:score.privacy@onescore.app). Please note that it may take about up to 7 business days to process your request or disabling our services on the App or Website. Note that we may retain certain information if necessary for legitimate business interests such as fraud prevention or to fulfil our legal and contractual obligations and compliance requirements.

### **Data Retention**

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- We will retain your information for as long as it is necessary to provide you the services available on the App or Website or your request for termination of your account with us, whichever is later. Post termination of your account, we may continue to use your anonymised data aggregated or in combination with anonymised data of other users. We use this aggregated anonymised data for data analysis, profiling and research purposes. In certain circumstances, we may be unable to delete your account, such as if there is any outstanding dispute, or unresolved claims pending on your account. However, upon resolution of the issue preventing deletion, the information is immediately deleted and can't be recovered thereafter. We may keep your contact information along with your application details (if any) for fraud prevention purposes and for the exercise/ defence of a legal claim or for providing evidence in legal proceeding(s) to fulfil our legal and contractual obligations and compliance requirements.

### **Log Files**

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- This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may use the collected log information about you to improve services offered to you, to improve marketing, analytics, or App/Website functionality.

### **Confidentiality of your account**

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- The User is solely responsible for maintaining the security of his/her account and must not provide these credentials to any third party. If you believe that they have been stolen or been made known to others, you must contact us immediately at [score.privacy@onescore.app](mailto:score.privacy@onescore.app). We are not responsible if someone else accesses your account through the login credentials they have obtained from you or through a violation by you of this Privacy Policy.

### **Grievance Redressal Policy**

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- If you have any grievance or complaint, questions, comments, concerns or feedback in relation to the processing of information or regarding this Privacy Policy or any other privacy or security concern related to the App / Website, you can send an e-mail to Mr. Sumit Sharma on [grievances@onescore.app](mailto:grievances@onescore.app)

### **Changes to this privacy policy**

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- OCS retains the authority to modify this policy at its own discretion. We may revise this privacy policy to account for alterations in legislation, our data collection and usage practices, the functionalities of our services, or technological advancements. We encourage you to periodically review this page for the latest information on our privacy practices.

## **SECTION B. PRIVACY POLICY SPECIFIC TO ONEPL CREDIT PRODUCT**

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- This section is in addition to the general Privacy Policy as specified in Section A hereinabove. This section specifically applies to the users who avail the OnePL services as provided by OCS on the App/Website.
- The App/Website is a digital lending app (DLA) and OCS acts as a lending services provider (LSP) to various banks and NBFC (Lenders) and allows users to apply for and access personal loans from the Lenders (“PL”). Please see <https://www.onescore.app/lendingpartners/> for the full list of lenders. Please note that you may be subject to the privacy policy of the Lenders and the other obligations including in the loan documents in addition to this Privacy Policy.

### **Data collection and storage**

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- In addition to the information collected as specified in Section A, we may collect further information for providing the OnePL services. We may collect the following:
  - a. Father's name;
  - b. Nationality;
  - c. Employment Status;

- d. Residential Status;
  - e. Employer name;
  - f. Annual income;
  - g. Salary deposit mode; and
  - h. Bank account details (Bank name, account number, IFSC code).
- As a part of the application process for PL, we may share the data previously provided by you with the Lender(s). You may also have to provide additional information as a part of the application process. Any information provided specifically for the purpose of accessing PL or generated upon successfully receiving credit from the Lenders, will be retained to the extent required by OCS to carry out its LSP obligations as set out in its contracts with the Lender(s).
  - In respect of the information specifically provided as a part of the application process for PL, OCS and the Lender shall collectively decide and abide by the mutual understanding arrived at on matters regarding the storage of customer data including the type of data that can be stored, the length of time for which data can be stored, restrictions on the use of data, data destruction protocol, standards for handling security breach etc.
  - We do not collect your biometrics.
  - We will not access your mobile phone resources such as file and media, contact list, call logs, telephony functions, etc., in relation to the PL or as part of its role as a DLA / LSP. However, we may, with your prior explicit consent, seek one-time access for camera, microphone, location or any other facility necessary for the purpose of on-boarding requirements in connection with the PL.
  - All the data is stored in servers located in India.

#### **Data deletion and revocations**

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- You may request deletion of your data in accordance with 'Opt-Out' clause of Section A as set out above. Provided however, OCS as LSP and the Lenders may still retain data as required under applicable law and to the extent that any amounts are outstanding under PL or till the time approved in-principle credit limit is available to you.

#### **Information sharing**

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- Please refer to the clause pertaining to 'Information Sharing' as specified in Section A.

#### **Grievance Redressal Policy**

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- For OnePL related grievance or complaint, you can send email to our grievance officer by accessing the lending partners page (<https://www.onescore.app/lendingpartners/>). The grievance redressal officer shall address your concerns within a month from the date of receiving the grievance.