



# PRIVACY POLICY

B B Banthia Finance Pvt Ltd  
Compliance Department

<b>Document Title</b>	Privacy Policy
<b>Department</b>	Compliance Department
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<b>Prepared By</b>	Compliance Team
<b>Reviewed By</b>	Risk Team
<b>Approved By</b>	Board of Directors, BFPL
<b>Date of Approval</b>	1 April 2025
<b>Next Review Date</b>	31 March 2026

# PRIVACY POLICY

Compliance Department | B B Banthia Finance Pvt Ltd

## 1. INTRODUCTION

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B B Banthia Finance Pvt Ltd (hereinafter referred to as "BFPL" or "the Company") is a Non-Banking Financial Company registered with the Reserve Bank of India under Section 45-IA of the Reserve Bank of India Act, 1934. The Company is primarily engaged in the business of lending against pledge of gold jewellery and also extends other loan products including personal loans and business loans to select borrowers.

The Company collects, uses, stores, and processes personal and financial information of its customers, prospective customers, and other individuals in the course of its business operations. This Privacy Policy sets out the Company's commitment to protecting such information and governs how it is handled across all touchpoints — branches, phone, email, and any digital channels.

This Policy has been framed in accordance with the following applicable laws and guidelines:

- Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011
- RBI Master Direction on Know Your Customer (KYC), as amended from time to time
- RBI Master Direction — Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023
- Reserve Bank of India (Lending Against Gold and Silver Collateral) Directions, 2025
- Digital Personal Data Protection Act, 2023 (DPDPA) — to the extent applicable and as notified by the Government of India
- Prevention of Money Laundering Act, 2002 (PMLA) and Rules thereunder
- All other applicable RBI guidelines and circulars issued from time to time

This Policy is binding on all employees, officers, agents, and outsourced service providers of the Company across all branches and functions. It shall be published on the Company's website and a copy shall be made available to any customer on request, free of charge.

## 2. DEFINITIONS

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### 2.1 Data Principal

An individual whose personal data is collected, processed, or stored by BFPL. In this Policy, it refers to existing and prospective customers, guarantors, co-applicants, and any other individual whose data is collected in the course of the Company's business.

### 2.2 Data Fiduciary

An entity that determines the purpose and means of processing personal data. BFPL acts as the Data Fiduciary under the Digital Personal Data Protection Act, 2023.

## 2.3 Personal Data

Any information that relates to an identified or identifiable individual, including name, contact details, identification documents, financial information, and biometric data.

## 2.4 Sensitive Personal Data or Information (SPDI)

As defined under the IT (SPDI) Rules, 2011 — includes financial information, passwords, biometric data, health information, and official identification numbers such as Aadhaar and PAN.

## 2.5 Data Breach

Any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data held by BFPL.

## 2.6 Anonymisation

A process of removing personal identifiers from data so that individuals cannot be identified directly or indirectly.

## 3. OBJECTIVES

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The objectives of this Privacy Policy are to:

- Define what personal and financial information the Company collects and the lawful basis for doing so
- Establish clear standards for how such information is stored, used, and protected
- Set out the circumstances under which information may be shared with third parties
- Inform customers of their rights in relation to their personal information
- Ensure compliance with all applicable data protection laws and RBI guidelines
- Build and maintain customer trust through transparent and responsible data practices

## 4. SCOPE

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This Policy applies to all personal and financial information collected from existing and prospective borrowers of BFPL, guarantors and co-applicants on loan accounts, visitors to the Company's branches, website, or any digital platform operated by the Company, and any other individual whose information is collected in the course of the Company's business operations. It covers information collected through any channel — in person at branches, through physical forms, over the phone, via email, or through any digital means.

## 5. TYPES OF PERSONAL DATA COLLECTED

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The Company collects only such personal data as is necessary for lawful business purposes and regulatory compliance, including:

### 5.1 Identity and Profile Data

Full name, date of birth, gender, marital status, photograph, and signature.

### 5.2 Identity and KYC Documents

PAN Card, Aadhaar Card, Voter ID, Passport, Driving Licence, or any other Officially Valid Document (OVD) as per RBI KYC Master Directions.

### 5.3 Financial and Transactional Data

Loan account details including outstanding amounts, repayment history, and DPD status. Credit bureau reports obtained from CICs (CIBIL, Experian, Equifax, CRIF High Mark). Income details where required for credit assessment.

### 5.4 Gold Collateral Data

Details of gold jewellery pledged including purity, weight, valuation, and collateral images. Assaying certificate details.

### 5.5 Contact Information

Mobile number, email address, permanent and correspondence address.

### 5.6 Device and Technical Data

IP address, browser type, and access logs where applicable on the Company's website or digital platforms.

## 6. LAWFUL BASIS AND PURPOSE OF PROCESSING

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BFPL processes personal data on the basis of consent obtained from the customer and legal obligations under applicable laws. The purposes of processing include:

- To process loan applications, conduct credit assessment, and make sanction decisions
- To complete KYC verification and comply with AML and CTF obligations as required under RBI KYC Master Directions and PMLA
- To disburse loans, collect repayments, and manage loan accounts through their full lifecycle
- To issue Loan Sanction Letters, Key Facts Statements (KFS), repayment schedules, and other loan documentation
- To communicate with customers regarding their loan accounts, including reminders, alerts, and notices
- To report credit information to Credit Information Companies (CICs) as required by the Credit Information Companies (Regulation) Act, 2005 and RBI guidelines

- To comply with all regulatory reporting obligations to the RBI, FIU-IND, income tax authorities, and any other statutory body
- To process and resolve customer grievances and complaints
- To detect, prevent, and investigate fraud, money laundering, and other financial crimes
- To conduct internal audits, risk management, and management reporting

The Company shall not use customer information for marketing or any purpose beyond those listed above without the explicit written consent of the customer.

## 7. CONSENT AND WITHDRAWAL

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- BFPL obtains the consent of the customer before collecting or processing personal data. Consent is obtained at the time of loan application through the loan application form and KYC documentation.
- Customers may withdraw their consent at any time by making a written request to the Nodal Officer. Withdrawal of consent shall limit the Company's ability to provide or continue certain services and shall not affect any processing already carried out prior to withdrawal.
- Certain data processing — including KYC verification, credit reporting to CICs, PMLA compliance, and regulatory reporting — is mandated by law and does not require separate customer consent. Such processing shall continue regardless of consent withdrawal.

## 8. DATA SHARING AND THIRD PARTIES

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The Company treats all personal and financial information of customers as strictly confidential. Information shall not be shared with any third party except in the following circumstances:

- As required by law, a court order, or a regulatory or governmental authority — including the RBI, Enforcement Directorate, FIU-IND, income tax authorities, or any other statutory authority
- With Credit Information Companies (CIBIL, Experian, Equifax, CRIF High Mark) for credit reporting as required by regulation
- With empanelled auditors, legal counsel, or consultants bound by confidentiality obligations, strictly for the purpose of their engagement
- With outsourced service providers engaged by the Company (such as recovery agencies or technology vendors) on a need-to-know basis and under a formal confidentiality or data processing agreement
- With the explicit written consent of the customer
- Where sharing is in the interest of the borrower — such as fraud prevention or complaint resolution

The Company shall not sell, trade, or rent customer data to any third party under any circumstances.

Where a recovery agency is engaged, its details shall be published on the Company's website and the borrower shall be informed before recovery proceedings are initiated.

Where any outsourced agency has access to customer data, the Company remains responsible for ensuring that such agency handles the data in compliance with this Policy.

## 9. DATA SECURITY

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- All customer data shall be stored securely in systems and physical records maintained at the Company's branches and HO, with appropriate access controls in place
- Access to customer data shall be restricted on a need-to-know basis. Only employees who require access to perform their designated functions shall be authorised to access customer records
- The Company shall implement and maintain reasonable technical and organisational security measures to protect personal information from unauthorised access, loss, misuse, alteration, or destruction
- Physical loan documents, KYC records, and gold collateral files shall be stored in secured locations at branches with restricted access
- Any employee found to have accessed, disclosed, or misused customer data in an unauthorised manner shall be subject to disciplinary action, including termination and legal proceedings where warranted

## 10. DATA BREACH MANAGEMENT

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- Any suspected or confirmed personal data breach shall be reported immediately to the Nodal Officer and the MD upon detection
- Within 24 hours of detection, the incident shall be verified, contained, and documented. Immediate steps shall be taken to prevent further exposure
- Affected customers shall be notified of a breach where it is likely to cause harm to their rights or interests, within a reasonable time of confirmation
- The Company shall notify the RBI and CERT-In as per applicable regulatory requirements within the prescribed timelines
- Upon notification of obligations under the DPDPA 2023, the Company shall additionally notify the Data Protection Board of India as required
- All breaches, along with the remedial actions taken, shall be documented in a Data Breach Register maintained by the Compliance team and reviewed by the MD

## 11. DATA PRINCIPAL RIGHTS

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Customers shall have the following rights in relation to their personal data:

### 11.1 Right to Access

Customers may request access to confirm what personal data the Company holds about them and how it is being processed.

### 11.2 Right to Correction

Customers may request correction of any inaccurate or incomplete information. The Company shall update records promptly upon verification.

### 11.3 Right to Erasure

Customers may request erasure of their data, subject to the Company's regulatory retention obligations under PMLA, RBI guidelines, and other applicable laws.

### 11.4 Right to Withdraw Consent

Where processing is based on consent, customers may withdraw consent for any use not required for loan servicing, regulatory compliance, or fraud prevention.

### 11.5 Right to Grievance Redressal

Customers who have a concern about how their data is being handled may raise a grievance as set out in Section 15 of this Policy.

Requests to exercise any of the above rights shall be submitted in writing to the Nodal Officer. Acknowledgement shall be provided within 7 working days and the concern shall be resolved within 30 days of receipt.

## 12. DATA RETENTION AND DESTRUCTION

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- The Company shall retain KYC records and loan-related documents for a minimum of 5 years post cessation of the customer relationship, as required under the Prevention of Money Laundering Act, 2002
- All other customer records — including loan files, repayment history, and transaction records — shall be retained for a minimum of 8 years from the date of closure of the loan account, or for such longer period as may be required by applicable law or RBI guidelines
- Physical gold collateral records, assaying certificates, and pledge receipts shall be retained for a minimum of 8 years from the date of release or auction of the collateral
- Records pertaining to loans subject to legal proceedings shall be retained until the final disposal of such proceedings, regardless of the standard retention period
- After the applicable retention period has lapsed, customer records shall be disposed of securely — shredded physically or deleted digitally — in a manner that prevents unauthorised access or reconstruction

## 13. CHILDREN'S DATA

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- The Company shall not knowingly collect or process personal data of minors (individuals below 18 years of age) for the purpose of extending loans or credit, as loans shall not be sanctioned to minors
- If personal data of a minor is inadvertently collected, it shall be deleted immediately upon discovery and the relevant loan application shall be rejected

## 14. DIGITAL CHANNELS AND WEBSITE

- The Company's website may collect basic technical information such as IP addresses and browser data through standard web server logs. This is used solely for system administration and security purposes
- The Company does not currently originate loans through digital lending platforms. In the event any digital lending platform is engaged in future, all data handling shall comply with the RBI (Digital Lending) Directions, 2025 and applicable RBI guidelines on data privacy
- The Company shall not use cookies or tracking technologies to build marketing profiles or share customer data with advertisers

## 15. GRIEVANCE REDRESSAL

Customers who have a concern or complaint regarding how their personal information has been collected, used, stored, or shared may raise a grievance through the Company's Grievance Redressal Mechanism as set out in POL-Compliance-003.

Privacy-related grievances may be directed to:

<b>Nodal Officer</b>	Mr. Pravin Bhagat
<b>Email</b>	nodalofficer@bbbanthia.com
<b>Contact</b>	8976505158
<b>Principal Nodal Officer</b>	Mr. Suyog Banthia
<b>Email</b>	pno@bbbanthia.com

If the concern is not resolved internally within 30 days, the customer may approach the RBI Complaint Management System at: <https://cms.rbi.org.in>

## 16. REGULATORY COMPLIANCE AND REVIEW

- This Policy is reviewed and approved by the Board of Directors of BFPL
- This Policy shall be reviewed annually or more frequently if required by changes in applicable law, RBI guidelines, or significant changes in the Company's data handling practices
- Any amendments shall require Board approval and shall be updated on the Company's website promptly
- Compliance with this Policy shall be subject to periodic internal audit. Gaps or violations identified shall be reported to the MD and the Board, and corrective action taken within a defined timeline.

## 17. CONTACT DETAILS

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<b>Company Name</b>	B B Banthia Finance Pvt Ltd
<b>Registered Address</b>	776 MG Road, Tapal Naka, Panvel, Raigad, Maharashtra - 410206
<b>CIN</b>	U67200MH1997PTC316740
<b>Customer Care</b>	8981 900 900
<b>Customer Care Email</b>	care@bbbanthia.com
<b>Nodal Officer</b>	Mr. Pravin Bhagat
<b>Nodal Officer Email</b>	nodalofficer@bbbanthia.com
<b>Principal Nodal Officer</b>	Mr. Suyog Banthia
<b>PNO Email</b>	pno@bbbanthia.com
<b>Website</b>	<a href="https://bbbanthiafinance.com">https://bbbanthiafinance.com</a>

**AUTHORISED SIGNATORIES AND VERSION HISTORY**

**Board of Directors — B B Banthia Finance Pvt Ltd**

Suyog Banthia — Managing Director	Gaurav Banthia — Director	Rajesh Banthia — Director
DIN: 06814791	DIN: 06814782	DIN: 06814787
Signature: 	Signature: 	Signature: 
Date: 23rd Mar 2026	Date: 23rd Mar 2026	Date: 23rd Mar 2026
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**Version History**

Version	Date	Prepared By	Reviewed By	Approved By	Summary
V1.0	1 April 2025	Compliance Team	Risk Team	Board of Directors	Initial release