

## Privacy Policy

L&T Finance Limited (formerly known as L&T Finance Holdings Limited) (“LTF” or “we” or “us” or “our”) is concerned about your privacy. Please read this Privacy Policy (“Privacy Policy”) before using LTF’s online Campaign Platform for [www.sapnowalidwali.com](http://www.sapnowalidwali.com) (“Campaign Platform”). By using the Campaign Platform or submitting the information on the Campaign Platform, you (“You or “your” or “yourself” or “User”) agree that you are of the age of 18 years or above and expressly consent to the processing and use of the information according to the Privacy Policy.

This Privacy Policy is in accordance with the Information Technology Act, 2000 and the Information Technology (Reasonable Security and Procedures and Sensitive Personal Data or Information) Rules, 2011 prescribed thereunder and any amendments thereto, (“Applicable Law”) that is intended to provide you with clear and complete information about the treatment of your Sensitive Personal Data or Information (*defined hereinafter*) that LTF collects in connection with your use of the Campaign Platform and the way your Sensitive Personal Data or Information is stored and used by LTF.

For the purpose of this Privacy Policy, the term “Data” shall mean and include all information and details supplied by the User or accessed by the LTF or third party including Personal Information / Sensitive Personal Data or Information.

For the purposes of this Privacy Policy, “Personal Information / Sensitive Personal Data or Information” shall mean and include all information and details supplied by you through online or offline interactions or accessed by the LTF or third party including sensitive personal data/information that identifies individuals, such as individual’s name, address, date of birth, bank account details, phone number, location, email address, and any other data that is connected to such information.

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as Sensitive Personal Data or Information. By registering and nominating on our Campaign Platform you specifically consent in favour of LTF to the use, processing and transmission/transfer/sharing of your Sensitive Personal Data or Information including with third parties.

You shall be at liberty at any time to discontinue the use/transfer/transmission and sharing of any of your Sensitive Personal Data or Information, by writing to us and informing us of the same.

Subject to the foregoing, your Sensitive Personal Data or Information shall be held by us in strict confidence and as per the provisions of the Applicable Law, (which includes the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011)), and except as stated herein, we will not disclose any of your Sensitive Personal Data or Information to any other person without your express prior consent.

### **1. Information Collection, Purpose and Use**

- We collect your various types of Data (including Personal Information) for the purpose and usage (as enlisted under this Privacy Policy), including to provide you with our services, improve our offerings, and ensure compliance with legal and regulatory requirements. Personal Information collected, as applicable, includes, but is not limited to:
  - i. Contact information such as name, age, gender, photo, address, phone number, e-mail id;

- ii. Password for Campaign Platform registration;
  - iii. Financial information such as bank account or credit card or debit card or other payment instrument details;
  - iv. Sexual orientation;
  - v. Biometric information;
  - vi. Usage and Technical Information such as Your device details such as device identifier, internet bandwidth, browser type, operating system, mobile device model, browser plug-ins, and cookies or similar technologies that may identify your browser and plug-ins, and time spent, internet protocol (IP) address and location;
  - vii. Any of the information received in connection with the clauses herein.
- We use your Personal Information and/or Sensitive Personal Data or Information (in some cases, in conjunction with your non-identifiable information) for registration purpose on the Campaign Platform and may also use it to provide the service as per Terms and Conditions, which you can view at [https://sapnowalidiwali.com/TC\\_Sapno%20Wali%20Diwali.pdf](https://sapnowalidiwali.com/TC_Sapno%20Wali%20Diwali.pdf) and administer your inquiries.
  - You acknowledge and hereby agree that LTF may share your Personal Information (in some cases, in conjunction with your non-identifiable information) with third-parties in order to provide services on the Campaign Platform and serve you with a better user experience.
  - Certain non-identifiable information would be considered a part of your Personal Information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered non-identifiable information when they are taken alone or combined only with other non-identifiable information (for example, viewing preferences). We may combine your Personal Information with non-identifiable information and aggregate it with information collected from other users to attempt to provide you with a better experience, to improve the quality and value of the Campaign Platform and to analyse and understand your personality. We may also use the combined information without aggregating it to serve you.
  - LTF (and its licensors, if applicable) owns exclusively and absolutely all rights, title and interest, including all related intellectual property rights, in the Campaign Platform and the services, and any suggestions, ideas, improvements, enhancement requests, feedback, recommendations and other information provided by the you relating to the Campaign Platform and its services.

## 2. What this Privacy Policy Covers

This Privacy Policy covers LTF's treatment of your Personal Information that we collect when you use the Campaign Platform. This notice does not apply to companies or entities that LTF does not own or control, or has no contractual relationship with. If you choose not to provide the Personal Information that we seek from you, then you may not be able to avail the Campaign Platform services and we may also not be able respond to any queries that you may have.

## 3. Disclosure of Information

- **Campaign Platform Information and Non-Identifiable Information:** LTF may share Campaign Platform information that may or may not include your Personal Information and may

otherwise disclose non-identifiable Information to third-parties for industry analysis, demographic profiling and other commercial and/or non-commercial purposes.

- **Compliance with Laws and Law Enforcement:** LTF co-operates with government and law enforcement officials and private parties to enforce and comply with the law. LTF will disclose any information about the User that it collects to any governmental or law enforcement officials as LTF, in its sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of LTF or a third party, to protect the safety of the public or any person, or to prevent or stop activity LTF may consider to be, or to pose a risk of being, any illegal, unethical or legally actionable activity.
- **Business Transfers:** LTF may sell, transfer or otherwise share some or all of its assets, including any Personal Information, or non-identifiable information in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.
- **Account Information:** The User agrees to keep confidential and not to disclose to any other individual or individuals for all time the User name and password related to their respective account.
- We may also use your Personal Information for internal purposes, such as auditing, data analysis and research to improve the Campaign Platform and customer communications.

#### 4. Handling Personal Information with Consent

By using the Campaign Platform and/or by providing your Personal Information, you consent to our use of your Personal Information in accordance with this Privacy Policy, as may be amended from time to time. When you disclose any Personal Information with respect to other people to us, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy. You also agree and consent to us collecting, storing, processing, transferring, and sharing your Personal Information with third parties or service providers for the purposes set out in this Privacy Policy. Further, if you have availed our services, you agree and authorize us to communicate with you via channels like phone calls and e-mails for the purposes set out in this Privacy Policy.

#### 5. Cookies

Like many Campaign Platforms, we use "**cookies**" to collect information. A cookie is a small data file that LTF transfers to the User's computer's hard disk for record-keeping purposes. We use cookies for two purposes. Firstly, LTF utilizes persistent cookies to save the User's registration ID and login password for future logins. Secondly, LTF utilizes session ID cookies to enable certain features of the Campaign Platform and its services, to better understand how the User interacts with the Campaign Platform and to monitor the aggregate usage by the Users and web traffic routing on the Campaign Platform. Unlike persistent cookies, session cookies are deleted from the User's computer when the User logs off from the Campaign Platform and closes its browser. Third-party Users may also place or read cookies on the User browser. The User can instruct its browser, by changing its options, to stop accepting cookies or to prompt before accepting a cookie from the Campaign Platforms the User visits. If the User does not accept cookies, however, it may not be able to use all portions and functionality of the Campaign Platform.

#### 6. Links to Third Party Websites/Campaign Platforms

The Campaign Platform may contain links to other third-party websites/Campaign Platforms. The User's use of websites/Campaign Platforms to which the Campaign Platform links is subject to the terms of use and privacy policies located on such third party websites/Campaign Platforms. LTF absolutely disclaims any liability or responsibility for any disclosure by you or anyone on your behalf of any of your Personal Information, which may be posted on any parts of the Campaign Platform.

## **7. Storage and Retention of Information**

We shall store the Personal Information and/or Sensitive Personal Data or Information only in servers located within India. We shall retain your Personal Information and/or Sensitive Personal Data or Information as may be required to carry out our operations under applicable laws / regulations / licenses or under the consent provided by you and only for a period that it is required for the purpose for which it was collected. However, even upon revocation of consent we may retain Personal Information and/or Sensitive Personal Data or Information related to you if we believe it may be required to prevent fraud or future abuse or if required by law such as in the event of the pendency of any legal/regulatory proceeding or receipt of any legal and/or regulatory direction to that effect or for other legitimate purposes.

We shall delete the Personal Information and/or Sensitive Personal Data or Information in accordance with applicable laws, once it has completed its retention period.

## **8. Security**

LTF is concerned with safeguarding the User Personal Information and/or Sensitive Personal Data or Information. LTF employs industry-standard encryption to protect data transmissions and other safety measures designed to protect information from unauthorized access. LTF will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to you via email insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

## **9. Notice Changes**

LTF reserves the right to change and revise this Privacy Policy, and will post any substantial revisions on its Campaign Platform. LTF encourages the User to review this Privacy Policy regularly for any changes. The continued use of the Campaign Platform will be subject to the then-current Privacy Policy.

## **10. Access and Rectification of Personal Information / Revocation of Consent**

You can access and review your Personal Information shared by you by placing a request with us. LTF gives you the ability to edit the information (that is logged in when you register to access the Campaign Platform), and preferences at any time, including whether you want LTF to contact you about offers etc., and any new services that it offers in the future. In addition, you may at any time revoke consent given to us to store your Personal Information and/or Sensitive Personal Data or Information. Upon such revocation, you may lose access to services that were availed on the basis of the consent provided. In some cases, we may continue to retain your information as per the 'Storage and Retention of Information' section of this Privacy Policy. To raise any of the above requests, you may write to us using the contact information provided under the 'Contact Us' section of this Notice.

## **11. Contact Us**

If you have any questions about this Privacy Policy, please contact us at:

Name of Privacy Officer: Mr. Mohd. Imran

Phone: 022 62125520

Email: mohdimran@lts.com

## **12. Governing Laws and Jurisdiction**

This Privacy Policy is governed by the laws of Republic of India without regard to conflict of laws and the Courts of Mumbai, India shall have exclusive jurisdiction in any matter arising from this Privacy Policy.

## **Copyrights**

All rights reserved. No part of this document may be reproduced or transmitted in any form and by any means without the prior permission of Company.

**(By participating in this Campaign, you acknowledge that you have read and understood this Privacy Policy and agree to its terms)**