

PRIVACY NOTICE

I. INTRODUCTION

At Saraswat Co-operative Bank Ltd. (Scheduled Bank), [referred to as “we”, “us”, “our”] we prioritize the privacy and security of your personal data/information across our platforms. As a premier financial institution in India, we are dedicated to maintaining the confidentiality, integrity, and security of your personal data. This Privacy Notice outlines how we collect, use, disclose and protect your personal data in compliance with the Digital Personal Data Protection Act, 2023 (DPDA), the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, Information Technology Act, 2000 and other relevant Indian laws and regulations which are notified by the Government of India and the regulators from time to time.

Our commitment extends to all the ways you interact with us, whether it be through our physical branches, mobile applications, digital lending applications, internet banking, social media, and/or other digital platforms. We aim to be transparent about our personal data/information handling practices.

This Privacy Notice applies to all personal data/information processed by us, including personal data/information collected from our customers, website, visitors, and users of our digital and mobile banking services. By engaging with our services, you trust us with your personal data/information, and we are dedicated to upholding that trust by ensuring robust data protection measures.

To learn how we manage your personal data and information and the precautions we take to secure it, please carefully read our Privacy Notice. Please use the following contact information to contact us with any questions or complaints about our privacy practices on email ID customerservicecentre@saraswatbank.com. We value your trust and are committed to managing your personal data and information in an ethical and secure manner on all our platforms.

In order for you to understand how and why we are processing your personal data/information, we encourage you to read this notice as well as any additional, more detailed information we may provide you at different times when we are collecting or processing personal data/information on our website, products/applications, events and initiatives. (Note: Where there is an employment relationship between Saraswat Co-operative Bank Ltd. (Scheduled Bank) and our employees, we release a distinct privacy notice.)

II. DEFINITIONS USED IN THIS NOTICE

- a) **Personal Data/Information** means any data/information that relates to a natural person, which, either directly or indirectly, in combination with other data/information, can identify such person.
- b) **Sensitive Personal Data/Information** means Sensitive personal data/information of a person means such personal data/ information which consists of information relating to:
 - i. Password
 - ii. financial information such as Bank account or credit card or debit card or other payment instrument details
 - iii. physical, physiological and mental health condition
 - iv. sexual orientation
 - v. medical records and history
 - vi. Biometric information
 - vii. race or ethnicity,

- viii. political opinions,
- ix. religious beliefs or similar beliefs,
- x. membership of a trade union,
- xi. commission or alleged commission of any offence
- xii. genetic data
- xiii. any of the information received under from the above mentioned by body corporate for processing, stored or processed under lawful contract or otherwise.

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.

- c) **Body Corporate** means any company and includes a firm, sole proprietorship or other association of individuals engaged in commercial or professional activities.
- d) **Biometrics** means the technologies that measure and analyze human body characteristics, such as 'fingerprints', 'eye retinas and irises', 'voice patterns', 'facial patterns', 'hand measurements' and 'DNA' for authentication purposes.
- e) **Data** means a representation of information, facts, concepts, opinions or instructions in a manner suitable for communication, interpretation or processing by human beings or by automated means.
- f) **Automated** means any digital process capable of operating automatically in response to instructions given or otherwise for the purpose of processing data.
- g) **Digital Personal Data/Information** means personal data/information in digital form.
- h) **Processing** in relation to personal data/information, means a wholly or partly automated operation or set of operations performed on digital personal data/information, and includes operations such as collection, recording, organization, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.
- i) **Child** means an individual who has not completed the age of eighteen years.
- j) **Data Fiduciary** means any person who alone or in conjunction with other persons determines the purpose and means of processing of personal data/information.
- k) **Data Principal** means the individual to whom the personal data/information relates and where such individual is: a child, includes the parents or lawful guardian of such a child; a person with disability, includes her lawful guardian, acting on her behalf.
- l) **Data Processor** means any person who processes personal data/information on behalf of a Data Fiduciary
- m) **User** shall mean such Persons who are using the Bank's services or the Bank's website/mobile application and to whom this Notice is applicable.

III. DATA/INFORMATION WE COLLECT

We collect various types of data/information to provide and improve our services. The data/information collected can be broadly categorized into Personal data/information, non-personal data/information, and Children's data/information.

PERSONAL DATA/INFORMATION

Personal data/information refers to data/information that identifies or can be used to identify an individual. This includes, but is not limited to:

A. IDENTIFICATION DATA/INFORMATION

- Name
- Date of Birth
- Photograph/CCTV
- Identification documents (Aadhaar, PAN, Passport, etc.)
- Passport Details

B. CONTACT DATA/INFORMATION

- Residential Address
- Phone number
- Email Address

C. FAMILY DATA/INFORMATION

- Spouse name, age, phone number, residence address, employment details
- Mother's name, age, phone number, residence address, employment details
- Father's name, age, phone number, residence address, employment details

D. FINANCIAL DATA/INFORMATION

- Bank Account Details
- Credit and Debit Card Information
- Credit History and Financial Status
- Income Details
- Loan Account Details and History

E. EMPLOYMENT DATA/INFORMATION

- Employer Name and Address
- Job Title
- Salary and Employment History
- Business Ownership Details

F. DEVICE DATA/INFORMATION

- IP Address
- Device ID
- Browser type and Version
- Operating System
- Mobile Network information

G. MEDICAL HEALTH DATA/INFORMATION (If Applicable)**Non-Personal Data/Information**

Non-personal data/information refers to data/information that does not directly identify an individual. This includes, but is not limited to:

- **Usage Data:** data/information about how you use the application, such as features used, pages viewed, and the time spent on the Application.
- **Aggregated Data:** Statistical Data that does not identify any individual user but helps in understanding user behavior and improving services.

CHILDREN'S DATA/INFORMATION

We understand the importance of protecting children's privacy. Our website, any digital platform, is not intended for children under the age of 18 years. We do not knowingly collect personal data/information from children without parental consent. If we become aware that a child has

provided us with personal data/information without parental/guardian consent, we will delete such personal data/information from our records.

For the users under the age of 18 years, parental consent is mandatory and required for:

- Account Creation
- Data collection
- Communication: Any communication regarding the child's account will be directed to the parent or guardian.

IV. COLLECTION METHODS

We collect personal data/information through the following methods, but is not limited to:

A. DIRECT INTERACTIONS

- Account Creation: Information provided during account creation/registration.
- Loan Application
- Customer Support: when you interact with our staff, including customer service officers, relationship managers and other representatives, for example, via telephone calls, letters, face-to-face meetings, and email.
- Images captured via CCTV cameras while Data Principals are within our premises, or via photographs or videos taken by us or our representatives at events hosted by us.
- Use of our services provided online and other technology platforms, such as websites and apps.

B. AUTOMATED TECHNOLOGIES

- Cookies
- Web Beacons
- Log Files

C. THIRD PARTIES

- D. Credit Bureaus
- E. Identity Verification Services
- F. Financial Institutions

V. PROCESSING/USE OF PERSONAL DATA/INFORMATION

We process/use your personal data/information for various purposes to provide and improve our services, including, but not limited to:

A. PROVIDING SERVICES

- Processing Applications
- Identity Verification
- Account Management
- Provide banking and financial services
- Process transactions and manage accounts

B. CUSTOMER SUPPORT

- Responding to inquiries
- Technical Support
- Enhance customer service and support
- Personalize banking experience and marketing communications (consent based)

C. COMPLIANCE AND RISK MANAGEMENT

- Legal Compliance – To comply with legal and regulatory requirements, including KYC and Anti Money Laundering
- Risk Management

D. MARKETING AND COMMUNICATION

- Promotional materials and updates about our products and services (consent based)
- Market Research
- Personalization

E. ANALYTICS AND IMPROVEMENT

- Usage Analysis
- Service Improvement
- Product Development

F. LEGITIMATE USE

- For personal data/information provided voluntarily by the Data Principal
- For fulfilment of any legal/judicial obligations of a specified nature
- For responding to any medical emergencies and health services, breakdown of public order.
- For purposes related to employment.

VI. INFORMATION SHARING AND DISCLOSURE

We will share your personal data/information with third parties when you have given us your explicit consent to do so. This includes situations where you authorized us to share your personal data/information for a specific purpose, which includes but is not limited for:

A. Everyday business purposes: We may share your personal data/information for our everyday business purposes, including:

- **Processing transactions:** Sharing with payment processors, payment networks and other entities involved in your transactions.
- **Account Maintenance:** Sharing with service providers that help us manage your accounts, such as data storage and customer service provider.
- **Service Providers and Vendors:** Sharing with third party service providers that perform functions on our behalf, such as IT services, marketing, co-branded products or services, support services, data analysis, and customer service support. These providers are contractually obligated to protect your personal data/information and use it only for the services they provide us.

B. Legal and regulatory requirements – We may disclose your personal data/information to third parties to comply with legal obligations, including:

- **Law enforcement and government authorities:** Sharing personal data/information with law enforcement agencies, regulatory bodies, and government authorities when required by law to protect the rights and safety of our customers, employees, or others.
- **Compliance with Legal processes:** Responding to legal notices, court orders and/or legal proceedings.

C. Marketing Purposes – We may share your personal data/information with third parties for marketing purposes. This includes:

- **Joint marketing partners:** Sharing with partners to offer co-branded products or services. These partners are required to safeguard your personal data/information and use it only for the purposes we specify.
- **Direct marketing:** With your explicit consent we may share your personal data/information with affiliates to market their products or services to you.

- D. Business transfers** – In the event of a merger, acquisition, or sale of assets, we may transfer your personal data/information to the involved third party. The receiving entity will be required to honor the commitments we have made in this privacy notice.

VII. COOKIE POLICY

We may use cookies and similar technologies on our websites, mobile applications, and in our emails. Cookies are small data (text) files stored on your device when you visit our website. The text in a cookie often consists of a string of numbers and letters that uniquely identifies your device, but it can contain other information as well. We use cookies and similar technologies for several purposes, which may include:

- **Storing your Preferences and Settings** - Settings that enable our website to operate correctly or that maintain your preferences over time may be stored on your device.
- **Sign-in and Authentication** - When you sign into our website using your credentials, we store a unique ID number, and the time you signed in, in an encrypted cookie on your device. This cookie allows you to move from page to page within the site without having to sign in again on each page. You can also save your sign-in information, so you do not have to sign in each time you return to the site.
- **Security** - We use cookies to detect fraud and abuse of our websites and services.
- Enhance website functionality.
- Analyze site usage and improve services.
- Personalize content and advertisements – We use JavaScript to undertake these tasks

A. Types of cookies used:

- **Essential Cookies:** Necessary for operations of the Website
- **Performance Cookies:** Collects information on website usage
- **Functionality Cookies:** Remember user preferences and enhance experience
- **Targeting Cookies:** Deliver relevant advertisements to user

You can manage your cookie preferences through your browser settings. However, disabling cookies may affect your experience on our website.

B. Use of analytical cookies by us

When we send you a targeted email, subject to your preferences, which includes web beacons, cookies or similar technologies we will know whether you open, read, or delete the message. When you allow the Performance Cookies on your browser, we can associate cookie information with an identifiable individual. For example: When you click a link in a marketing e-mail you receive from us or fill up a form on our website, we will also use a cookie to log what pages you view and what content you download from our websites. Combining and analyzing personal data/information we may combine data collected from performance cookies active on your browser. We use this information to improve and personalize your experience with our websites, provide you with content that you may be interested in, create marketing insights, and to improve our services.

C. Cookie details

Some of the cookies we commonly use are listed below. This list is not exhaustive, but it is intended to illustrate the main reasons we typically set cookies. If you visit our website, the site may set some or all the following cookies:

- Strictly Necessary Cookies

- Performance Cookies
- Functional Cookies
- Targeting Cookies

D. Customize Cookies

We may periodically update this Cookie Policy to reflect changes in our practices. If needed, in such situations we will prompt you to revisit your cookie settings and submit your preferences again.

E. How to control cookies manually

You can set your browser:

- To allow all cookies
- To allow only 'trusted' sites to send them.
- To accept only those cookies from websites you are currently using.

We recommend not to block all cookies because our website uses them to work properly.

VIII. DIGITAL LENDING APPLICATIONS

For Digital lending, we collect your personal data/information not limited to the following:

- Identification details
- Financial information
- Contact information.
- Loan application details.
- Credit scores and history.
- Employment/Business ownership and income details
- Location data (based on explicit consent)
- Health related information for specific loan requirement

We collect your personal data/information through:

- Online application forms submitted via our digital lending application/platform.
- Interactions with our customer service teams through various channels (phone, email, physical interaction)
- Automated collection through cookies and other tracking technologies when you use our website and mobile application/internet banking.
- Third party sources such as credit bureaus, employers, and government agencies

We process/use this information to:

- Process loan application.
- Assess creditworthiness.
- Provide loan offers and terms.
- Monitor loan repayment and manage defaults.
- Provide Customer Service
- Conduct risk management.
- Comply with legal requirements
- Market products and provide personalization

We may disclose your personal data/information to:

- Service providers – Third party vendors and partners which provide services on our behalf.
- Regulatory Authorities
- Affiliated Entities
- Any other entity with your explicit consent for any specific purposes

Notwithstanding anything mentioned hereinabove, we shall not be responsible and/or liable for any additional information you may choose voluntarily to provide directly to any service provider or a third party.

IX. USE OF VENDORS/THIRD PARTY

We may engage third-party vendors to provide services on our behalf. These third parties are required to:

- Adhere to our privacy and security standards.
- Use personal data/information only for the agreed-upon services.
- Ensure data protection and confidentiality.

X. THIRD PARTY LINKS ON OUR WEBSITE

Our website may contain links to third-party websites that are not operated by us. These links are provided for your convenience and reference only. Please be aware that we do not control, endorse, or review the content, privacy practices, or the availability of these external sites. When you click on a third-party link, you will be directed to that third party's site, and any information you provide or that is collected by these sites will be governed by their respective privacy policies.

We strongly advise you to review the privacy policy of every site you visit. We are not responsible for the privacy practices or the content of these third-party sites. By accessing these links, you acknowledge and agree that we are not liable for any losses, damage/s or other harm that may result or arising from your interaction with these third-party websites.

How we use third party links:

Occasionally, we may include links to third party sites that we believe might be of interest or benefit to our customers. These links are carefully selected based on their relevance and potential value to our users. However, inclusion of these links does not imply endorsement or an association with the third-party sites.

XI. DATA SECURITY

We implement robust security measures as mentioned below to protect your data:

- Encryption of data in transit and at rest
- Access controls and authentication mechanisms
- Regular security audits and Vulnerability Assessments

XII. CUSTOMER RIGHTS

As a customer, Data Principal you have the following rights regarding your personal data/information that we collect/process/disclose as a Data Principal:

- **Access** – Rights to request access to your personal data/information

- **Correction** – Right to request correction of inaccurate or incomplete personal data/information
- **Deletion** – Right to request deletion of your data under certain conditions (Provided no regulatory requirements mandate retention of your personal data/information)
- **Objection** – Right to object to processing of your personal data/information based on legitimate interests
- **Restriction** – Right to request restriction of processing under certain circumstances.
- **Grievance redressal** – Right to have readily available means of grievance redressal
- **Nomination** – Right to nominate heir for executing rights of the Data Principal in case of death or incapacity.
- **Withdrawal of consent** – Right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

XIII. DATA RETENTION

We may retain your personal data/information for as long as your registration with us is valid and you have any outstanding payment/s due and/or payable. Additionally retain your personal data/information where necessary to fulfill the purposes outlines in this notice, comply with legal obligations, and resolve disputes. We may archive your personal data/information as per regulatory requirements.

XIV. CHANGES TO THIS POLICY

We may update this Privacy Notice periodically. We will notify you of significant changes through our website or other communication channels (based on explicit consent)

XV. CONTACT INFORMATION

For any privacy related queries or concerns please contact us at:

Email: customerservicecentre@saraswatbank.com

Address: Saraswat Co-operative Bank Ltd Ekanath Thakur Bhavan, 953, Appasaheb Marathe Marg, Prabhadevi, Mumbai- 400 025