



<b>Policy No</b>	<b>Title</b>	<b>Last Board Approved Date</b>
18	Policy on Privacy & Security of Client Data	
<b>Circular No</b>	<b>Prepared By</b>	<b>Date Prepared</b>
BE&I/18/02	Pramitee Behera, Prashant Kumar	29 <sup>th</sup> December, 2021
<b>Version No</b>	<b>Reviewed By</b>	<b>Date Reviewed</b>
2.0	Divyam Gupta	31 <sup>st</sup> December, 2021
<b>Pre-Version No</b>	<b>Issuing Department</b>	<b>Last Issue Date</b>
1.1	Internal Process and Policy	1 <sup>st</sup> October, 2019
<b>Effective Date</b>	<b>Approved By</b>	<b>Date Approved</b>
15 <sup>th</sup> January, 2022	Thangaraju K, & Divaker Jha	3 <sup>rd</sup> January, 2022

### **Statement of Confidentiality**

This document is confidential in nature and contains information that is proprietary and confidential to Satin Creditcare Network Limited (SCNL) which shall not be disclosed outside SCNL, transmitted, or duplicated, used in whole or in part for any purpose other than its intended purpose. Any use or disclosure in whole or in part of this information without explicit written permission of Satin Creditcare Network Ltd is prohibited.



**1. Objective:**

To ensure the privacy of client details which are taken at the time of loan processing.

**2. Scope:**

The policy is applicable to all employees SCNL

**3. Applicability:**

This policy is effective from **15<sup>th</sup> January, 2022**.

**4. Features:**

1. SCNL does not share information pertaining to its clients with anyone except Regulatory Authorities.
2. All employees need to exercise due care to ensure that the information pertaining to our clients (members) is kept confidential.
3. Information should not be shared with any individual/organization without prior written approval from HO.
4. Anybody found divulging/sharing client Information with others without prior written approval from HO will be liable for disciplinary action.

**Post disbursement Client Data security:**

- a. One almirah and filing rack are assigned to every branch.
- b. The key of the record keeping Almirah shall be in control of the BM/ ABM.
- c. Without permission of BM/ABM, no external person shall be allowed to access any member/ loan related documents.

**Any lapse in the above mentioned process will lead to the serious disciplinary action against concerned staff.**

COO

Head- Process & Policy