

Data Retention Policy

Dhruva Capital Services Limited (NBFC)

1. Introduction

This Data Retention Policy (“Policy”) is adopted by **Dhruva Capital Services Limited** (“Company”), a Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India.

The Company provides digital lending services through its platform **NeoMoney** (mobile application and website).

Regulatory Disclosure:

All loans are **sanctioned, disbursed, and serviced solely by Dhruva Capital Services Limited.**

NeoMoney acts only as a **digital platform facilitating customer onboarding and servicing.**

This Policy defines how the Company collects, stores, retains, and disposes of customer and operational data in compliance with:

- RBI KYC Master Direction
 - RBI Digital Lending Guidelines
 - Prevention of Money Laundering Act, 2002 (PMLA)
 - Applicable data protection and IT laws
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2. Objective

The objectives of this Policy are to:

- Ensure regulatory compliance for data retention
 - Protect customer data privacy and confidentiality
 - Define retention timelines for different data categories
 - Prevent unauthorized access, misuse, or loss of data
 - Enable proper audit and reporting
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3. Scope

This Policy applies to:

- All customer data collected during onboarding and servicing
 - Transaction and financial data
 - Communication records
 - KYC/AML documentation
 - Data processed via NeoMoney platform
 - Employees, contractors, and third-party service providers
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4. Types of Data Collected

The Company may collect and retain the following categories of data:

4.1 Customer Identification Data

- Name, address, date of birth
- PAN, Aadhaar (where applicable and consented)
- Other Officially Valid Documents (OVDs)

4.2 Financial & Transaction Data

- Loan application details
- Disbursement and repayment records
- Bank account details

4.3 Communication Data

- Emails, SMS, call logs
- Customer support interactions

4.4 Technical Data

- Device information
 - IP address
 - App usage logs
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5. Retention Period

The Company retains data based on regulatory and operational requirements:

5.1 KYC & Customer Records

- Retained for **minimum 5 years after closure of account or end of business relationship**
- As required under PMLA and RBI guidelines

5.2 Transaction Records

- Retained for **minimum 5 years from the date of transaction**

5.3 Loan Documents

- Retained for **5–8 years** or as required by law or internal audit policies

5.4 Communication Records

- Retained for **3–5 years** for audit and dispute resolution

5.5 System Logs & Technical Data

- Retained for **1–3 years**, unless required for investigation or legal purposes
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6. Data Storage & Security

The Company ensures:

- Secure storage using encryption and access controls
- Role-based access to sensitive data
- Protection against unauthorized access or breaches

Data is stored in compliance with:

- RBI data localization requirements (where applicable)
 - IT Act and cybersecurity standards
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7. Data Usage

Data collected shall be used only for:

- Customer onboarding and verification
- Loan processing and servicing
- Risk assessment and fraud prevention
- Regulatory reporting and compliance
- Customer support and communication

No data shall be used beyond lawful and consented purposes.

8. Data Sharing

The Company may share data with:

- Regulatory authorities (as required by law)
- Credit bureaus
- Payment partners and banks
- Authorized service providers (LSPs)

Important Safeguards:

- Data sharing is done on a need-to-know basis
 - Third parties are bound by confidentiality and security obligations
 - Customer consent is obtained where required
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9. Data Deletion & Disposal

Upon expiry of retention period:

- Data shall be securely deleted, anonymized, or archived
- Physical records shall be shredded or destroyed securely
- Digital data shall be permanently erased from systems

Data may be retained beyond timelines if:

- Required by law
 - Under investigation or litigation
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10. Customer Rights

Customers may:

- Request access to their data
- Request correction of inaccurate data
- Request deletion, subject to regulatory requirements

Requests may be processed as per applicable laws and Company policies.

11. Third-Party Service Providers

Where third parties are engaged:

- The Company remains responsible for data protection
 - Vendors must comply with security and confidentiality standards
 - Data processing agreements shall be in place
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12. Monitoring & Audit

The Company shall:

- Conduct periodic audits of data retention practices
 - Monitor access and usage of sensitive data
 - Ensure compliance with regulatory requirements
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13. Grievance Redressal

For data-related concerns:

Dhruva Capital Services Limited

Grievance Redressal Officer: Ramesh Kumar Pandey
Email: grievance@dhruvacapital.com

NeoMoney Platform

Bishwajit Ghosh
Email: grievance@neomoney.app

If unresolved within 30 days, customers may approach:

RBI Integrated Ombudsman Scheme

Website: <https://cms.rbi.org.in>
Toll-Free: 14448

14. Policy Review & Updates

- This Policy shall be reviewed annually
 - Updates shall be made as per regulatory changes
 - Latest version will be published on:
 - <https://www.dhruvacapital.com/>
 - <https://neomoney.app/>
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15. Public Disclosure

This Policy is available on the Company's website in compliance with RBI and applicable legal requirements.