

INTRODUCTION

Dhruva Capital Services Limited (“Company”, “We”, “Us”), a Reserve Bank of India (RBI) registered Non-Banking Financial Company (NBFC), having its registered office at 33A, Chowringhee Road, Chatterjee International, Kolkata – 700071, operates the digital lending platform “NeoMoney”.

All loans are provided by Dhruva Capital Services Limited. NeoMoney is only the digital platform facilitating these services.

We are committed to protecting your personal data in compliance with applicable laws including:

- Information Technology Act, 2000
 - RBI Digital Lending Guidelines, 2022(as amended from time to time)
 - Digital Personal Data Protection Act, 2023
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2. DATA WE COLLECT

We collect only the minimum data necessary to provide our services:

a) Identity & Profile Data

- Name, date of birth, gender
- Address, email ID, mobile number

b) KYC Data

- PAN, Aadhaar or other officially valid documents

c) Financial Data

- Bank account details
- Income details
- Loan and repayment history

d) Device & Technical Data

- IP address
- Device type
- Operating system

3. DATA WE DO NOT COLLECT

We strictly comply with RBI Digital Lending Guidelines.

We do NOT access or collect:

- Contacts
- SMS or message data
- Call logs
- Installed applications
- Files, photos, or media
- Biometric data

4. PURPOSE OF DATA COLLECTION

Your data is used strictly for:

- Loan processing and underwriting
- KYC verification
- Fraud detection and risk assessment
- Customer support and grievance handling
- Compliance with legal and regulatory requirements

We do not use your data for any unrelated or unauthorized purposes.

5. CONSENT

- Data is collected only after obtaining your explicit consent
- Consent is recorded with timestamp for audit purposes
- You may withdraw consent at any time (subject to legal limitations)

6. DATA SHARING

We share your data only with regulated and authorized entities, including:

- RBI regulated lenders
- Credit Information Companies (CIBIL, Experian, Equifax, CRIF Highmark)

- KYC verification agencies
- Payment system providers and banks
- Technology service providers (under strict confidentiality agreements)

We do not sell your personal data to any third party.

7. DATA STORAGE & LOCALIZATION

- All data is stored securely on servers located in India
 - We do not transfer your personal data outside India
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8. DATA RETENTION

We retain data only as required by law:

- KYC records: Minimum 10 years after account closure
- Loan and transaction data: As per regulatory requirements

After the retention period, data is securely deleted or anonymized.

9. USER RIGHTS

You have the following rights under applicable laws:

- Right to access your data
 - Right to correct inaccurate data
 - Right to withdraw consent
 - Right to request deletion (subject to legal obligations)
 - Right to grievance redressal
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10. DATA SECURITY

We implement strong security measures including:

- Encryption of data in transit and at rest
- Secure servers and firewalls
- Access control mechanisms

In case of a data breach, we will notify affected users and authorities as required under applicable laws.

11. COOKIES

We may use cookies and similar technologies to improve user experience and platform functionality. Users may control cookie preferences through browser settings.

12. CHILDREN'S PRIVACY

Our services are not intended for individuals below 18 years of age. We do not knowingly collect data from minors.

13. GRIEVANCE REDRESSAL

For any complaints or concerns regarding your data:

Grievance Officer:

Name: Ramesh Kumar Pandey

Email: grievance@dhruvacapital.com

We will respond within 30 days.

If your complaint is not resolved satisfactorily, you may escalate it to the Reserve Bank of India through the CMS (Complaint Management System) under the Integrated Ombudsman Scheme.

14. POLICY UPDATES

We may update this Privacy Policy from time to time. Any changes will be published on this page.