

SMS Policy

This policy explains how Home First collects, stores, uses, shares and otherwise processes your personal data, for providing you services through our mobile application “Home First Customer Portal”.

In order to facilitate and provide you with various services through our mobile application “Home First Customer Portal” (“**App**”), Home First needs to collect financial data and information from you with your prior and explicit consent. We respect your privacy, maintaining the highest standards for protection of your personal information.

1. Collection of Data financial SMS information

- 1.1. We collect, monitor, analyse only financial SMS from your inbox which helps us in identifying your expenditure pattern across various bank(s) account(s) that you may be holding, cash flow patterns, description and amount of the transactions undertaken by you as a user to provide serviceability of your loan application, to reduce risk associated with your existing loan facility/ loan application, to help us perform a credit risk assessment to enables us to determine your risk profile and to provide you with the appropriate credit analysis. This process will enable You to look over your spending pattern and ensure that you have sufficient balance to service your EMI/ PEMI. This financial SMS data also includes your historical data.
- 1.2. The Information the App collects, and its usage, depends on how you manage your privacy controls on your device. When you install the App, we store the information we collect with unique identifiers tied to the device you are using. We collect information from the device when you download and install the App and explicitly seek permissions from You to get the required information from the device.
- 1.3. Please note that we do not access your call logs, files and media stored in your phone.

2. Changes In This Privacy Policy

- 2.1. We reserve the right to change, modify, add, or remove portions of this Privacy Policy at any time for any reason. In case, any changes are made in the Privacy Policy, we shall update the same on the App. Once posted, those changes are effective immediately, unless stated otherwise. We encourage you to periodically review this page for the latest information on our privacy practices. The continued access or use of the Services constitutes Your acceptance of the changes and the amended Privacy Policy.

3. Security Measures and Precautions

- 3.1. We ensure reasonable security measures in order to protect your personal information against loss, misuse or alteration of the data.
- 3.2. We employ separation of environments and segregation of duties and strict role-based access control on a documented, authorized, need-to-use basis. The stored data is stored in encrypted format.
- 3.3. Furthermore, we use industry-leading anti-virus, anti-malware, intrusion prevention systems and intrusion detection systems.
- 3.4. We implement reasonable administrative and technical safeguards to help us protect your information from unauthorized access, use and disclosure.
- 3.5. We have stringent security measures in place to protect the loss, misuse and alteration of information under control. We endeavour to safeguard and ensure the security of the information provided by you. We use Secure Sockets Layers (SSL) based encryption, for the transmission of the information, which is currently the required level of encryption in India as per applicable law.
- 3.6. We blend security at multiple steps within our products to ensure our systems maintain strong security measures.
- 3.7. We aim to protect from unauthorized access, alteration, disclosure or destruction of information we hold, including:
 - a) We offer security feature like an OTP verification to help you protect your account;
 - b) We review our information collection, storage, and processing practices, to prevent unauthorized access to our systems;
 - c) We restrict access to personal information to our employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations;
 - d) Compliance & Cooperation with Regulations and applicable laws;
 - e) We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.
 - f) We will not be collecting any personal SMS data apart from financial SMS data.
- 3.8. We or our affiliates maintain your information on servers located in India. We also comply with legal frameworks relating to the transfer of data as mentioned and required under the Information Technology Act, 2000 and rules made thereunder.
- 3.9. When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including

local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

4. Date Retention and Deletion Policy

- 4.1. We shall retain the data for the purposes highlighted. We do not retain your personal data for longer than required for the purpose for which the information may be lawfully used. Any requests for data deletion shall be entertained in accordance with our data deletion and retention policies.
- 4.2. However, we may continue to retain data attributes that are necessary to be retained under applicable laws or for our underwriting checks, fraud detection and prevention, reporting purposes or dispute management. Your request for data deletion and withdrawal of consent would be considered once you have repaid your loan and charges related to such loan.

5. Grievance Redressal

- 5.1. A customer may raise their queries or complaints by addressing an e-mail to our Chief Information Security Officer at the following address:
Mr. Gaurav Khetia (Chief Information Security Officer)
Home First Finance Company India Limited
511, Acme Plaza, Andheri Kurla Road, Andheri (East)
Mumbai-400 059
Email: privacy.matters@homefirstindia.com
Contact No. - +91 8880549911
Home First shall attempt to respond to all queries within 30 working days from the receipt of the complaint.