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1. Introduction and Background

The need for “The Data and Information Privacy Policy” in line with the new regulation on Data protection and data privacy.

NSDL Payments Bank Limited (“The Bank”) recognizes the expectations of its customers with regard to privacy, confidentiality and security of their personal information that resides with the Bank. Keeping personal information of customers secure and using it solely for activities related to the Bank and preventing any misuse thereof is a top priority of the Bank.

The Data and Information Privacy Policy (“Policy”) explains how NSDL Payment Bank (“we,” “us,” or “our”) collects, protects, uses, and divulges the personal data of our customers including employees in accordance with the Digital Personal Data Protection Act, 2023 (DPDP Act). The Digital Personal Data Protection Act, 2023 was notified in the Gazette of India on the 11th August, 2023. This Act provides for the processing of digital personal data in a manner that recognizes both the right of individuals to protect their personal data and the need to process such personal data for lawful purposes and for matters connected therewith or incidental thereto. The act shall come into force on the date the Central Government may appoint by notification in the Official Gazette.

Bank’s obligation under this policy shall hold good only for the data points shared by the Bank, for specific bona-fide purposes, which were not available with the receiving party prior to the sharing

The bank shall not be liable for the data points obtained by the receiving party at any point of time from sources other than the Bank.

PII and SPDI data treatment must be as per the internal SOP of the bank.

2. Abbreviations

- PII Personal Identifiable Information
- SPDI Sensitive Personal data or Information
- DPDP Digital Personal Data Protection Act

3. What Personal Data Bank Collect

The Bank may collect various types of personal data from customer, depending on customer interaction with our services. This may include:

- i. Contact information (name, email address, phone number)
- ii. Demographic information (age, gender, location)
- iii. Usage data (information about use of our website or app)
- iv. Device information (IP address, device type, device id, operating system)
- v. Content data (transaction data collected during relationship with the bank, information such as reviews or feedback etc which customer provides,)

4. Purpose & Objective

The Bank may use personal data collected from customer for various purposes, including:

- i. Providing and improving bank's services
- ii. Fulfilling customer's requests and processing their transactions
- iii. Sending marketing communications (with customer consent)
- iv. Personalizing customer experience
- v. Analyzing and improving bank's website or app
- vi. Complying with legal obligations

5. Legal Basis for Processing

The Bank shall process personal data based on various legal grounds such as:

- i. Based on explicit Customer consent
- ii. To perform a contract with customers
- iii. To comply with a legal obligation
- iv. For bank's lawful interests (e.g., improving services)

6. Sharing of Customer's personal Data

The Bank may be required to share customer's (any) personal data to third parties in certain situations, such as:

- i. Service providers who partner with the Bank to provide services to customers.
- ii. Specific consent for divulging specific personal data for a specific purpose to a specific party shall be obtained in such cases. The consent given by the Customer shall be free, specific, informed, unconditional and unambiguous with a clear affirmative action, and shall signify an agreement to the processing of customer's personal data for the specified purpose and be limited to such personal data as is necessary for such specified purpose. Advisories/notices received from Law enforcement or other government agencies
- iii. In the event of a merger or acquisition, to the entity in which the bank merges or by which it is acquired.

7. Eligibility criterion for third parties authorized to receive personal data:

The Bank shall divulge customers' personal data to only those third parties who have implemented appropriate security measures prescribed by the bank to protect personal data.

The customer has specifically authorized the bank to share data with the specific third party. (The Bank shall have a right to restrict the transfer of personal data for processing to such country or territory outside India as may be notified by the Central Government)

8. Customer's Right

Under the DPDP Act, customers have certain rights regarding their personal data, including:

- i. The right to access their personal data
- ii. The right to rectification of inaccurate data
- iii. The right to erasure of their data
- iv. The right to restrict the processing of data
- v. The right to object to the processing of data
- vi. The right to data portability

In due course the bank shall provide customers with mechanisms to exercise these rights easily.

9. Data privacy for Aadhar related information

The Bank shall ensure that employees and officials understand the implications of confidentiality and data privacy breach. The Bank does not solicit any Aadhar based information over website or over call. For customer onboarding channels, the Bank shall ensure all compliance to security and privacy requirements for storage as per Aadhar Act 2016 and regulations.

While considering authentication for Aadhar holders the following shall be ensured:

- i. Customer consent shall be taken that he/she has no objection in authenticating himself/herself with Aadhaar based authentication system and consent to providing his/her Aadhaar number, Biometric and/or One Time Pin (OTP) data (and/or any similar authentication mechanism) for Aadhaar based authentication for the purposes of KYC for opening the account and availing of the Banking Services from NSDL Payments Bank.
- ii. The Biometrics and/or OTP and/or any other authentication mechanism that customer provides for authentication shall be used only for authenticating his/her identity through the Aadhaar Authentication system for that specific transaction and for no other purposes.
- iii. NSDL Payments Bank shall ensure security and confidentiality of his/her personal identity data provided for the purpose of Aadhaar based authentication and shall not publish, display or post publicly, except for the purposes as may be specified by regulations,
- iv. NSDL Payments Bank shall not retain Aadhaar number or any document or database containing his/her Aadhaar number for longer than is necessary for the purpose specified above.

- v. Bank utilizes this Aadhar based authentication services by UIDAI for delivering the services under welfare schemes or notification(s) issued under Section 7 of Aadhaar Act, 2016 or for any other purpose which is backed by law

10. Data Retention

The Bank shall retain the customer's personal data for as long as necessary to fulfil the purposes for which it was collected and for any legal or compliance obligations.

Reference: Records, Information and Data Retention Policy

11. Children's Privacy

The Bank shall not knowingly collect personal data from children without verifiable parental consent. If any parent or guardian believes that his/her child has provided us with personal data, shall contact the bank.

12. Reasonable Security Practices and Procedures

The security of personal information is a priority and is protected by maintaining physical, electronic, and procedural safeguards that meet applicable laws. The Bank shall take reasonable steps and measures to protect the security of the customer's personal information from misuse and loss, unauthorized access, modification, disclosure or destruction. The Bank maintains its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission and storage of information. The Bank ensures that its employees and affiliates respect the confidentiality of any personal information held by the Bank.

13. Grievances redressal

To address any discrepancies or grievances related to the personal information residing with the Bank, the customer may visit: https://www.nsdlbank.com/customer_grievance_redressal.php. Accordingly, customers can call /or write on website or email or jiffy application.

14. Review or changes to Policy

The bank shall update this Policy from time to time. Bank shall notify to customer if any changes to the Privacy policy

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