



Servitium Micro Finance Private Limited

DATA PRIVACY POLICY

Board Meeting Date	Subject	Department	Approved / Reviewed by
16/12/2025	Data Privacy Policy	Compliance	Board of Directors



Privacy Policy

Servitium Micro Finance Pvt Ltd

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1. Introduction

We, **Servitium Micro Finance Pvt Ltd (SMPL)**, value the trust of our existing and prospective customers and respect their right to privacy.

This Privacy Policy explains how customer data is collected, processed, stored, used, and protected by us.

2. Purpose

The purpose of this policy is to provide clear direction to stakeholders and responsible personnel within SMPL to ensure protection of personal data of Aadhaar number holders, in compliance with:

- Aadhaar Act, 2016
- Aadhaar and Other Laws (Amendment) Act, 2019
- Aadhaar (Authentication) Regulations, 2016
- Aadhaar (Data Security) Regulations
- Aadhaar (Sharing of Information) Regulations, 2016
- Information Technology Act, 2000 and allied rules/regulations

3. Terms and Definitions

This section includes key terms like *Aadhaar Number, Aadhaar Data Vault, Authentication, ASA, AUA, Biometric Information, Consent, De-identification, Demographic Information, KUA, Global AUAs, Local AUAs, Hardware Security Module (HSM), Identity Information, Limited KYC, PID Block, Personal Data, Processing, Reference Key, Resident, Sensitive Personal Data, UID Token, Virtual ID (VID)* and others.

4. General Overview

We respect the privacy of every customer. This policy applies to all digital platforms (website, mobile apps, hybrid apps, etc.) used by SMPL. By using our services, customers agree to the terms stated in this policy.

5. Collection of Information

- **Personal Data:** Aadhaar number / Virtual ID collected directly from the Aadhaar number holder for authentication.
- **Personal Information:** Name, date of birth, contact details, address, and other details provided by customers via forms, applications, or surveys.

6. Specific Purpose for Collection of Personal Data

- Authentication of Aadhaar number holder.
- Used only as per Aadhaar Act, 2016 and regulations.
- Not used beyond the mentioned purpose without explicit consent.
- Strict processes to prevent misuse.

7. Notice / Disclosure of Information

Before collecting Aadhaar information, SMPL will disclose:

- Purpose of data collection.
- Whether Aadhaar is mandatory or voluntary.
- Availability of Virtual ID option.
- Name and address of SMPL as the collecting entity.

Customers will also be notified by SMS/email at the time of authentication.

8. Obtaining Consent

- Consent will be taken in writing or electronically.
- Logs of consent will be maintained.
- Consent must be **free, informed, specific, clear, and withdrawable**.

9. Processing of Personal Data

- Used only for Aadhaar authentication via CIDR.
- Not used for purposes beyond what is legally permitted.
- e-KYC data only used for customer identification and service delivery.

10. Retention of Personal Data

- Authentication transaction logs retained for **2 years**, archived for **5 years**, and then deleted (unless required for legal purposes).

11. Sharing of Personal Data

- No sharing in contravention of Aadhaar Act.
- Biometric data encrypted before transmission.
- Aadhaar number never transmitted insecurely.

12. Data Security

- Secure collection, transmission, and storage of Aadhaar/VID.
- Only UIDAI-certified devices used.
- Logs of authentication stored with UID Token instead of Aadhaar (for Local AUAs).
- Data breaches will be reported to UIDAI with full details.
- Access control measures, encryption, and NDAs enforced.

13. Rights of the Aadhaar Number Holder

- Right to access and update stored identity information.
- Right to revoke consent for e-KYC storage.
- Right to lodge complaints with the Privacy Officer.

14. Aadhaar Number Holder Access Request

- Requests will be formally recorded and processed after verifying identity.
- Responses will be provided within a reasonable timeframe.

15. Privacy by Design

- Privacy built into system/product design.
- Regular self-assessments.
- Anonymization and minimization principles applied.

16. Governance and Accountability Obligations

- A **Privacy Officer** will be appointed.
- A **Privacy Committee** will guide on strategic privacy matters.
- Regular internal and external audits (STQC / CERT-IN certified).
- Staff training on privacy and consent procedures.

17. Transfer of Identity Information Outside India

- Prohibited under Aadhaar Act.
- All identity information must be stored within India.

18. Grievance Redressal Mechanism

- Aadhaar number holders can contact the Privacy Officer via website, phone, SMS, or in writing.
- Contact details of Privacy Officer will be displayed on the company website and premises.
- Escalation as per Section 33B of the Aadhaar Act, 2016.

19. Responsibility for Implementation and Enforcement

SMPL management, Privacy Officer, and relevant staff members are responsible for enforcing and monitoring compliance with this Privacy Policy.



Servitium Micro Finance Pvt Ltd

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