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1. Introduction and Purpose

PNB Housing Finance Ltd., hereinafter referred to as “We” or “Us” or “Company” or “Organization” or “PNB HFL”, has created this Website Privacy Policy to inform the user of PNB HFL’s website regarding the collection, use and disclosure of Personal Information we receive from this site.

This policy applies to PNB HFL and covers PHFL Home Loans & Services Ltd. (herein referred to as PHFL) which is a subsidiary of PNB HFL. For purpose of this document any reference to PNBHFL means PNB HFL and PHFL.

PNBHFL does not knowingly solicit data online from, or market online to, children under the age of 18 years.

2. Nature and Categories of Personal Information Being Collected

PNBHFL may collect the following categories of personal information in providing its services:

- Transaction data such as name, email address, mobile number, address, account number, demographic information, such as your age, gender, financial transactional details, and other data provided by financial institutions or our partners, affiliates and third parties.
- Service data such as registration and payment data, data received while participating in marketing programs, rewards, offers, benefits, interests etc.
- Website, device and mobile app usage, and similar data collected via automated means, such as cookies and similar technologies.
- Job applications data is collected when you visit the Careers or Open Positions section.
- Business contact data is collected when you are one of our business partners, affiliates or third parties.

3. Modes of Collection of Personal Information

PNBHFL collects personal information and sensitive personal data, or information based on the services availed by you. PNBHFL obtains your data:

- When you avail our services and conduct transactions with reference to them
- When you participate in our marketing activities, including offers, benefits, rewards, surveys, contests, and promotions.
- When you contact us via one of our channels i.e., email, call, social media, etc.
- Via Cookies
- Via Service Providers or Third-Party Ad-Servers appointed by us
- Via the device you use to browse our websites or use our apps
- Via ads or online content from us and our Partners
- Via data publicly available through public and third-party platforms (such as social media), through online repositories, databases and/or directories, or that is otherwise legitimately obtained.

4. Purposes for Which Personal Information is Processed

PNBHFL uses your personal information to provide the services availed by you and to conduct business. PNBHFL will use your personal information and sensitive personal data or information including the following purposes, but not limited to:

- Create and manage your account.
- Provide and communicate with you about services offered by PNBHFL, financial institutions and partners, affiliates and third parties
- Email you regarding your account or order.
- Fulfil and manage loans, deposits, payments, and other transactions availed from website/mobile application.
- Generate a personal profile about you to make future visits to the website/mobile application personalized.
- Increase the efficiency and operation of the website/mobile application.
- Monitor and analyse usage and trends to improve your experience with the website/mobile application.
- Notify you of updates to the website/mobile applications.
- Offer new services.
- Prevent fraudulent transactions and identify any threats to information security.
- Monitoring and protection against criminal activity.
- Process payments and refunds.
- Administer promotions, and contests.
- Request feedback and contact you about your use of the website/mobile application.
- Resolve disputes and troubleshoot problems.
- Send you a newsletter.
- Solicit support for the website/mobile application.
- Operate, evaluate, and improve our business through analytics.
- Process your job application.
- Serve a legal obligation.
- Serve other purposes for which we provide specific notice at the time of collection, and as otherwise authorized or required by law.
- Respond to queries and complaints received from you regarding our services.
- Processing for activities where you have provided explicit consent to do so e.g., marketing communications, promotions, etc.

5. Change of Purpose

PNBHFL will only use your personal information for the purposes for which it was collected, unless it is required to be used for another reason that is compatible with the original purpose.

Please note that PNBHFL may process your personal information without knowledge or consent, where it is required or permitted by law, or for fulfilling contractual obligations.

6. Rights of Providers of Information:

The rights that are available to you are as follows:

- Right to confirm and access
- Right to correction
- Right to be forgotten
- Right to data portability
- Right to withdraw consent

You can exercise your rights by submitting a request to PNBHFL at DPO@pnbhousing.com.

Upon receiving the request from you, PNBHFL will conduct a verification check to validate your identity and accordingly process the request. If access or rectification is denied, the reason for the denial will be communicated and a written record will be made of the request and reason for denial. In this case, the affected person may make use of the dispute resolution processes described in law.

7. Personal Information Sharing and Disclosure

Disclosure of personal or sensitive personal information by PNBHFL to any third party shall be performed with prior permission from you, or in line with a contract between PNBHFL and you, wherein such disclosure has been agreed to, or where the disclosure is necessary for providing services to you as specified in “Purposes for Which Personal Information is Processed”. PNBHFL may share personal information as required or as permitted by law, such as:

- With credit bureaus and similar institutions.
- With regulatory authorities, government agencies and courts with our partners, affiliates and third parties who perform services for us

In addition to the above provision, we may share your information with government agencies as per the applicable law for the reasons mentioned below:

- Sovereignty or integrity of India,
- Defence of India,
- Security of the State,
- Friendly relations with foreign States or
- Public order or
- Preventing incitement to the commission of any cognizable offence relating to above or
- Investigation of any offence.

The personal information that you submit is processed as per requirements of applicable legislations and regulations. Regardless of where we process your personal information, we still protect it in the manner described in this privacy statement and according to the applicable laws.

8. Data Retention

PNBHFL will only retain your personal information for as long as necessary as per mandatory retention periods as per PNBHFL Policy for Preservation of Documents, to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, or contractual requirements. We will destroy the personal information in a secure manner at the end of its retention period as per our defined organisational retention policy and schedule.

When determining the retention period, PNBHFL considers various criteria, such as:

- Type of services requested by or provided to you.
- Nature and length of our relationship with you.
- Possible re-enrolment with our services; and
- Impact on the services we provide to you if we delete some data or as per mandatory retention periods provided by applicable laws.

9. Reasonable Security Practices and Procedures

PNBHFL will ensure Reasonable Security Practices and Procedures including but not limited to the following:

- Implement information security policies that contain managerial, technical, operational, and physical security control measures that secure information assets
- In the event of an information security breach, PNBHFL shall be prepared to demonstrate and report, as required by the regulatory agency created under the applicable law, that it has taken all necessary measures and has implemented security control measures in accordance with the documented information security policies
- Documented policies shall be reviewed on a regular basis (at least once a year or as and when PNBHFL undertakes significant upgradation of its process and computer resource) in line with the leading industry practices.

10. Grievances and Key Contacts

Any discrepancies or grievances will be addressed in a timely manner by PNBHFL. A DPO and other personnel designated to assist that DPO is designated, and his or her name and contact details are at all-time be published on the company's website. The DPO is singularly responsible for and accordingly redresses the grievances expeditiously (within one month from the date of receipt of the grievance).

For any additional queries related to processing of personal information or reporting of an incident/breach etc., please write to us at DPO@pnbhousing.com.

11. Review and Amendments to this Policy

The policy is subject to reviews from time to time (at least once in a year), or in case of a change in the business environment or a change in the applicable regulations and legislations.

12. Key Definitions

- **“Provider of Information”**: The individual who provides the information. The Term "Person" is defined to mean and include natural persons as understood under the applicable Indian laws.
- **“Personal information”**: Any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, can identify such person.
- **“Data”** means a representation of information, knowledge, facts, concepts or instructions which are being prepared or have been prepared in a formalised manner, and is intended to be processed, is being processed or has been processed in a computer system or computer network and may be in any form (including computer printouts magnetic or optical storage media, punched cards, punched tapes) or stored internally in the memory of the computer.
- **"Processing"** in relation to personal data, means an operation or set of operations performed on personal information, and may include operations such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, use, alignment or combination, indexing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure, or destruction
- **“Company” or “Body Corporate”** means the body corporates as defined in Section 43 A of the IT Act 2000 and for the purposes of this policy means and refers to PNBHFL.
- **"Sensitive personal data or information"** means such personal information, which may, reveal, be related to, or constitute—
 - financial data
 - health data
 - official identifier
 - sex life
 - sexual orientation
 - biometric data
 - genetic data
 - transgender status
 - intersex status
 - caste or tribe
 - religious or political belief or affiliation or
 - Any other data categorised as sensitive personal data under applicable regulations and legislations
- **"Financial data"** means any number or other personal data used to identify an account opened by, or card or payment instrument issued by a financial institution to a data principal or any personal data regarding the relationship between a financial institution and a data principal including financial status and credit history.
- **"Child"** means a person who has not completed eighteen years of age.