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Sustainable Agro-commercial Finance Ltd.

Data Privacy Policy

Version 1

Sign of Sheet		
APPROVED BY	**Board of Directors**	25th June 2026
REVIEWED & RECOMMENDED BY	**Prabhakar Bobde** MD & CEO	24th June 2026
PREPARED BY	**Sumeet Karkhanis** **Head-Risk**	24th June 2026

Change History		
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Data Privacy Policy	1.0	June 2026

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Data Privacy Policy

1. Introduction

Sustainable Agro commercial Finance Ltd (hereafter referred to as "the Company") acknowledges the paramount importance of privacy, confidentiality, and security in the handling of personal information entrusted to us by our customers. As a Non-Banking Financial Company (NBFC) affiliated with the Reserve Bank of India (RBI), we operate within a regulatory framework that places a strong emphasis on data privacy and protection. In line with this commitment, we have developed a comprehensive data privacy policy aimed at safeguarding the personal information of our customers and ensuring compliance with regulatory requirements.

In today's digital age, where information is increasingly digitized and inter connected, the protection of personal data has become a critical concern for individuals and organizations alike. At Sustainable Agro commercial Finance Ltd, we recognize the trust placed in us by our customers when they share their personal information, and we are dedicated to upholding that trust through transparent and responsible data handling practices.

The purpose of this data privacy policy is twofold to articulate our commitment to protecting the privacy and security of customer data and to provide clarity on how we collect, use, share, and protect personal information. By clearly outlining our data handling practices and procedures, we aim to instill confidence among our customers regarding the protection of their personal information and foster a culture of transparency and accountability.

This policy applies to all individuals who interact with Sustainable Agro commercial Finance Ltd and whose personal information is collected, processed, stored, or handled by the Company. Whether customers engage with us through our online portals, mobile apps, electronic communications, or other channels, they can rest assured that their privacy rights will be respected and protected in accordance with this policy.

As part of our commitment to continuous improvement, we regularly review and update our data privacy practices to align with evolving regulatory requirements, technological advancements, and industry best practices. We encourage our customers to familiarize themselves with this policy and reach out to us with any questions or concerns they may have regarding the handling of their personal information.

In conclusion, Sustainable Agro commercial Finance Ltd is firmly committed to protecting the privacy, confidentiality, and security of the personal information entrusted to us by our customers. By adhering to the principles outlined in this policy and maintaining robust data protection measures, we aim to uphold the highest standards of data privacy and security while building trust and confidence among our valued customers.

This introduction serves as a preamble to the data privacy policy, setting the tone for the Company's commitment to data protection and providing context for the policies and procedures outlined therein.

2. Objective

2.1 Establish Trust and Confidence:

- One of the primary objectives of the data privacy policy is to establish trust and confidence among customers regarding the protection of their personal information.
- By clearly outlining the measures taken to safeguard personal data and adhering to stringent privacy standards, Sustainable Agro commercial Finance Ltd aims to reassure customers that their information is handled with the utmost care and respect for privacy.

2.2 Ensure Compliance with RBI Regulations:

- As a Non-Banking Financial Company (NBFC) affiliated with the Reserve Bank of India (RBI), Sustainable Agro commercial Finance Ltd is mandated to comply with RBI regulations and directives concerning data privacy.
- The objective is to ensure that all practices related to the collection, storage, processing, and sharing of personal information align with RBI guidelines, thereby maintaining regulatory compliance and upholding the integrity of the financial system.

2.3 Implement Robust Data Protection Measures:

- Another key objective is to implement robust measures to safeguard the confidentiality, integrity, and availability of personal data.
- Sustainable Agro Commercial Finance Ltd is committed to employing state-of-the-art technology, stringent access controls, and comprehensive security

protocols to protect against unauthorized access, data breaches, and other security threats.

- By investing in robust data protection measures, the Company aims to mitigate risks associated with data breaches and unauthorized access, thereby safeguarding customer trust and reputation.

2.4 Enhance Customer Experience:

- A well-defined data privacy policy also serves to enhance the overall customer experience by demonstrating a commitment to protecting personal information and privacy rights.
- By providing transparency regarding data handling practices and ensuring that customer information is used only for legitimate purposes, Sustainable Agro commercial Finance Ltd seeks to foster a positive relationship with customers based on trust, transparency, and respect for privacy.
- Enhancing the customer experience through transparent data privacy practices contributes to long-term customer loyalty, satisfaction, and retention.

2.5 Enable Informed Decision-Making:

- The data privacy policy aims to empower customers to make informed decisions about the use of their personal information.
- By providing clear information about data collection, usage, sharing practices, and options for managing privacy preferences, Sustainable Agro commercial Finance Ltd enables customers to exercise control over their personal data and make informed choices about sharing their information.
- Enabling informed decision-making promotes transparency, accountability, and trust between the Company and its customers, fostering a mutually beneficial relationship built on respect for privacy and data protection principles.

3. Definition

Personal Information (PI): This encompasses any information, whether direct or indirect, related to a natural person and capable of identifying said individual. Personal Information includes but is not limited to names, addresses, contact details, identification numbers, and other similar data.

Sensitive Personal Data or Information (SPDI): SPDI encompasses a broad spectrum of highly confidential information such as passwords, financial details (e.g., bank account, credit card), health records, sexual orientation, biometric data, and any other data that could potentially lead to the identification or sensitive characterization of an individual.

Third Party: Any entity not directly affiliated with Sustainable Agro commercial Finance Ltd or its customers, including external organizations, service providers, regulatory bodies, and other stakeholders.

4. Personal Information:

Personal Information constitutes a wide array of data points that may include demographic details, financial records, employment information, educational background, and any other data directly associated with an individual's identity or circumstances. It is vital to emphasize that while certain information may be publicly available or disclosed under applicable laws, it is not automatically classified as sensitive personal data or information. However, Sustainable Agro commercial Finance Ltd remains committed to safeguarding all personal information entrusted to us, regardless of its sensitivity or accessibility status.

5. Scope:

This policy casts a wide net, encompassing all individuals who engage with Sustainable Agro commercial Finance Ltd and whose personal information is collected, received, transmitted, processed, stored, or handled by us. It applies uniformly to sensitive personal data or information in any conceivable form or mode. However, it is imperative to clarify that while this Privacy Policy governs Sustainable Agro commercial Finance Ltd.'s practices, it does not extend to third-party websites linked to our platforms.

6. Applicability of the Policy:

This policy holds way over personal information and sensitive personal data or information procured by Sustainable Agro commercial Finance Ltd or its affiliates directly from customers. It extends its reach across various channels, including but not limited to our online portals, mobile apps, electronic communications, and any other means through which data is obtained.

7. Use of Personal Information:

At the core of Sustainable Agro commercial Finance Ltd 's data management ethos lies a well-defined purpose for the collection and utilization of personal and sensitive personal data. Committed to regulatory compliance, including KYC/E-KYC/C-KYC norms stipulated by the Reserve Bank of India (RBI), the company diligently collects and employs financial information and personal details from customers. It is imperative to highlight that personal information is gathered for specific business purposes or lawful reasons, with explicit customer consent obtained for any additional usage.

While rigorous efforts are made to ensure the accuracy of customer-provided information, absolute authenticity cannot always be guaranteed. Sustainable Agro commercial Finance Ltd refrains from disclosing personal information for cross-selling or any other purposes without explicit consent. However, the company cannot assume liability for publicly available or lawfully disclosed information.

Personal information serves as a cornerstone for various operational endeavors undertaken by Sustainable Agro commercial Finance Ltd This data is utilized to facilitate customer applications, verify identities, mitigate fraud risks, disseminate critical information, conduct data analysis, and tailor personalized experiences. However, it's crucial to note that while the company ensures responsible usage of personal information, it cannot be held accountable for the content, usage, or privacy policies of linked sites.

Recognizing the importance of information sharing under specific circumstances, Sustainable Agro commercial Finance Ltd adheres to stringent protocols to safeguard customer privacy. Personal information may be shared with external entities solely for service provision, transaction completion, or legal compliance, in accordance with applicable laws and regulations.

8. Consent:

By furnishing personal information, individuals unequivocally consent to Sustainable Agro commercial Finance Ltd.'s utilization of such data for purposes directly related to our products or services. This consent extends to personal verification, processing applications, facilitating transactions, maintaining records, and ensuring the provision of optimal services while safeguarding the interests of the Company.

9. Reasonable Security Practices and Procedures:

The security and confidentiality of personal information are paramount concerns for Sustainable Agro commercial Finance Ltd As such, the Company diligently maintains robust physical, electronic, and procedural safeguards designed to meet or exceed applicable legal requirements. Employees and affiliates alike are mandated to uphold the strictest confidentiality standards concerning personal information entrusted to the Company.

10. Information Protection:

Leveraging state-of-the-art technology, Sustainable Agro commercial Finance Ltd endeavours to manage and maintain customer information with the utmost care, ensuring both confidentiality and protection. A comprehensive array of physical, electronic, and managerial procedures have been implemented to safeguard and secure the information collected by the Company.

11. Retention and Disposal:

Sustainable Agro commercial Finance Ltd adheres to a prudent policy regarding the retention and disposal of information. Data is retained only for as long as necessary to fulfil business objectives or satisfy legal, regulatory, or accounting requirements. When information is deemed obsolete or no longer necessary for business operations, appropriate measures are taken to dispose of or de-identify personally identifiable information in a secure manner, in accordance with legal obligations.

12. Amendments/Notice of Change:

Sustainable Agro commercial Finance Ltd reserves the right to amend this Policy periodically in response to evolving regulatory requirements or technological advancements. Customers are advised to review the privacy policy periodically to stay informed about any alterations or updates. As the Company continually integrates advanced technology and refines its processes, it remains committed to maintaining transparency and keeping customers abreast of any policy alterations.

13. Cookie Policy:

Sustainable Agro commercial Finance Ltd.'s digital platforms leverage various third-party analytical tools that utilize cookies to enhance the browsing experience and provide personalized services. By accessing and utilizing the Company's website, users implicitly consent to the placement of cookies on their devices. However, users retain the autonomy to manage their cookie preferences by adjusting settings within their device/browser configurations. This affords users the flexibility to disable or delete cookies as per their discretion, thereby exercising control over their browsing experience and privacy preferences.

14. Contact Information:

For any inquiries or concerns regarding data privacy, individuals may contact:

Mrs. Pranali Sulakhe
Compliance Officer
Corporate.Secretarial@safl.in
Sustainable Agro Commercial Finance Ltd

15. Conclusion:

In conclusion, Sustainable Agro commercial Finance Ltd is steadfast in its commitment to safeguarding the privacy, confidentiality, and security of personal information entrusted to us by our valued customers. We operate in strict adherence to RBI regulations and directives, employing robust measures to ensure compliance and uphold customer trust. Through transparent policies, diligent practices, and continuous improvement initiatives, we strive to maintain the highest standards of data privacy protection, thereby fostering enduring relationships built on trust and integrity.