Privacy Policy

Perfect Finsec Private Limited, operating as "Perfect Finmart"

Covers: www.perfectfinmart.com and related web properties, the Perfect Finmart customer-facing services, and the Perfect Finmart Staff mobile application (Google Play package: com.perfectfinmart.staff, and its iOS equivalent).

Effective Date: 30 August 2026 | Version 2.0

1. Introduction and Scope

Perfect Finsec Private Limited (“Perfect Finmart,” “Company,” “we,” “us,” or “our”) provides financing, mortgage/loan-against-property, equity research and broking, and related services. This Privacy Policy explains what personal data we collect, why we collect it, how we use, share, store, and protect it, and the choices and rights available to you, when you:

- visit or use our website(s), including submitting an enquiry, lead form, or WhatsApp message;
- use the Perfect Finmart Staff mobile application, available on Google Play and the Apple App Store, which is restricted to authorised Company personnel; or
- otherwise interact with us as a customer, prospective customer, vendor, or website visitor.

This Policy is drafted to comply with the Google Play Developer Program Policy (including the User Data policy and Data Safety requirements), Apple's App Store Review Guidelines and App Privacy requirements, India's Digital Personal Data Protection Act, 2023 (“DPDP Act”) and rules made thereunder, the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, and applicable Reserve Bank of India (RBI) guidelines on data handling and digital lending disclosures. Where a specific mobile app store or regulatory requirement is more protective of the user than a general clause elsewhere in this Policy, the more protective provision applies to that platform.

By using our website, the App, or our services, you acknowledge that you have read and understood this Policy. Where consent is the legal basis for processing (for example, location, camera, or microphone access on the App, or marketing communications), we will obtain your affirmative consent separately, and you may withdraw it at any time as described in Section 10.

2. Data Controller / Data Fiduciary

Perfect Finsec Private Limited is the data fiduciary (data controller) responsible for the personal data described in this Policy.

Registered / Correspondence Address: T-24A, Green Park Extension, New Delhi – 110016, India
Phone: +91 98991 06930 | 011-47722222
Email: admin@perfectfinmart.com | **Website:** www.perfectfinmart.com

3. Information We Collect — Website and Customer-Facing Services

3.1 Information you provide to us

- **Identity and contact details:** name, phone number, email address, city, and similar details submitted through enquiry/lead forms, click-to-WhatsApp ads, or WhatsApp Business conversations.
- **Enquiry and application details:** the nature of the loan/financial product you are enquiring about, indicative amount, and information you choose to share in the course of an enquiry, application, or KYC process (where you proceed to a formal application, additional KYC and financial information is collected under, and governed by, our separate loan application and KYC documentation, consistent with RBI norms).
- **Communications:** records of calls, WhatsApp messages, emails, or website chat you have with us.

3.2 Information collected automatically

- **Traffic and device data:** IP address, browser type, device type, pages viewed, referring pages, and approximate location inferred from IP address.
- **Cookies and similar technologies:** as described in Section 7.
- **Advertising identifiers and campaign data:** when you arrive via an advertisement (for example, a Meta/Google click-to-WhatsApp or lead ad), we and our advertising partners receive information confirming the ad interaction and, where you consent, conversion data used to measure and improve campaign performance.

We do not require website visitors to create an account merely to browse informational pages. Certain features (for example, submitting a loan enquiry) require you to provide the identity and contact details listed above.

4. Information We Collect — Perfect Finmart Staff Mobile Application

The Perfect Finmart Staff application is an internal tool for authorised employees of Perfect Finsec Private Limited (loan processing, recovery, credit survey, and related field and back-office work). **It is not directed at, and may not be used by, children under 18, and is not available to the general public or to customers.**

4.1 Data collected through the App

- **Account and login information:** staff username, and a one-time password (OTP) sent to the employee's registered phone number or email for authentication.
- **Staff contact details:** phone number and email address, where needed for verification or account recovery.
- **Precise and approximate location (GPS):** collected during active use of Credit Survey and other field-work features, to record the location of a survey/visit and to support supervision, fraud prevention, and audit trails.
- **Photos, videos, audio (with video), and documents:** captured or uploaded by staff in the course of a credit survey, recovery visit, or process work — for example, property photographs, signed forms, or supporting documents.
- **Customer/case work data:** loan or case information that staff enter or view in the course of their duties, which may include financial information relating to customers. This data belongs to, and is processed on behalf of, the Company; it is not “collected from” the staff member for the staff member's own purposes.
- **Device identifiers / push tokens:** used to deliver work-related push notifications, where notifications are enabled.
- **Diagnostic and crash data:** basic technical logs used to identify and fix bugs and to keep the App secure.

4.2 How App data is used

- authenticating staff and securing access to the App and underlying systems;
- operating credit survey, recovery, and loan-processing workflows;
- maintaining business records, and supporting internal audit, compliance, and regulatory reporting (including to RBI where applicable);
- sending work-related notifications and alerts;
- detecting, investigating, and preventing fraud, misuse of the App, or breach of Company policy;
- improving the App's functionality, reliability, and security.

We do not sell App data, and we do not use App data collected from staff devices for third-party advertising. App data is used solely for the internal business, compliance, and operational purposes described above.

5. How We Use Personal Information (General)

- to respond to your enquiry and provide information about our products and services;
- to process, evaluate, and service loan and financial product applications, in accordance with our KYC and underwriting processes and applicable RBI guidelines;
- to communicate with you, including service updates, transactional messages, and — where you have consented — promotional/marketing messages, which you may opt out of at any time;
- to measure and improve our website, advertising campaigns, and services;
- to comply with applicable law, regulation, court orders, or lawful requests from government or regulatory authorities;
- to detect, prevent, and investigate fraud, security incidents, or misuse of our website, App, or services;

- for internal record-keeping, audit, and grievance-redressal purposes.

We process personal data only for the purposes disclosed in this Policy, purposes you reasonably expect given the context of collection, or additional purposes for which we have given notice and, where legally required, obtained your consent. We do not claim an unconditional or unrestricted right to use your personal data for unrelated purposes.

6. How We Share Information

We share personal data only in the following circumstances, and always subject to confidentiality and data-protection obligations placed on the recipient:

- **Service providers:** cloud hosting, CRM, customer-communication (including WhatsApp Business Solution Providers), analytics, and IT-support vendors who process data on our behalf and under our instructions, solely to help us operate our services.
- **Advertising and analytics partners:** platforms such as Meta and Google, solely to deliver, measure, and improve advertising campaigns and website analytics, and only to the extent you have not opted out where consent is required.
- **Group companies and Perfect Foundation:** where necessary for shared business operations, internal reporting, or the Company's corporate social responsibility activities, on a confidential, need-to-know basis.
- **Regulators and law-enforcement authorities:** RBI, courts, tribunals, or other government/regulatory authorities, where required or permitted by law, or in response to a valid legal process.
- **Professional advisers:** auditors, legal counsel, and similar advisers bound by confidentiality obligations.
- **Business transfers:** in connection with a merger, acquisition, restructuring, or sale of assets, subject to the acquiring entity honouring the commitments in this Policy.

We do not sell personal data to third parties, and we do not share App data collected from staff devices for third-party advertising. Any future sharing arrangement not described above will be disclosed through an update to this Policy before it takes effect, in line with Section 18.

7. Cookies and Tracking Technologies

Our website uses cookies and similar technologies (such as pixels and SDKs from advertising partners) to recognise returning visitors, remember preferences, measure traffic and campaign performance, and improve the site. Cookies do not, by themselves, identify you by name. You can control or disable cookies through your browser settings; disabling cookies may affect some website functionality. The Perfect Finmart Staff App does not use advertising cookies or SDKs.

8. Data Retention

- **Website enquiries/leads:** retained for as long as reasonably necessary to respond to the enquiry and for a limited follow-up period thereafter, after which they are deleted or anonymised unless a longer period is required by law or by an active customer relationship.
- **Customer/loan records:** retained for the duration of the loan or product relationship and thereafter for the period mandated by RBI, the DPDP Act, applicable limitation laws, and our record-retention policy.
- **Staff App data:** retained for as long as the employee's account is active, and thereafter as needed for employment, audit, legal, or regulatory purposes, after which it is deleted or anonymised per Company policy.
- Even after you request deletion or account closure, limited data may remain in secure backups or archival systems for a reasonable period, consistent with our legal and regulatory retention obligations, before being permanently purged.

9. Data Security

We implement reasonable technical and organisational security measures — including access controls, encryption in transit, and restricted, role-based access to systems — designed to protect personal data against unauthorised access, alteration, disclosure, or destruction. No method of transmission or storage is completely secure, and while we work to protect your information, we cannot guarantee absolute security. We will notify affected individuals and the relevant regulator of a personal data breach where required by applicable law.

10. Your Rights and Choices

Subject to applicable law (including the DPDP Act) and to our legal, regulatory, and employment obligations, you may:

- request access to, and a copy of, the personal data we hold about you;
- request correction of inaccurate or incomplete personal data;
- request erasure of your personal data, or withdrawal of consent, where it is not otherwise required for a loan/legal relationship, compliance, or record-keeping purpose;
- opt out of marketing/promotional communications at any time (a link or reply-STOP option is provided with such communications, or you may email us);
- nominate another individual to exercise your rights in the event of your death or incapacity, as provided under the DPDP Act;
- lodge a grievance with our Grievance Officer (Section 17), and, if unresolved, with the Data Protection Board of India or other competent authority.

To exercise any of these rights, write to admin@perfectfinmart.com. We will respond within the time frame required by applicable law. Some requests may not be fully actionable where retention is required by law, an active loan relationship, or legitimate business records.

11. Children's Privacy

Our website and services are directed at adults capable of entering into a binding financial relationship. The Perfect Finmart Staff App is restricted to authorised adult employees and is not directed at children under 18. We do not knowingly collect personal data from children. If we become aware that we have inadvertently collected data from a child, we will delete it promptly.

12. App-Specific Terms (Google Play and Apple App Store)

12.1 Permissions

The App requests the following device permissions, each used only for the stated purpose and requested at the point of first use:

- **Location (precise/approximate):** for Credit Survey and other field-work features.
- **Camera and microphone:** to capture photos, videos, and audio-with-video for survey, recovery, or process documentation.
- **Storage/files:** to attach and upload documents required for a case.
- **Notifications:** to deliver work-related alerts.

You can manage or withdraw these permissions at any time through your device settings; declining a permission may limit or disable the corresponding feature.

12.2 No sale of data; no third-party advertising

We do not sell App user data as defined by Google Play policy, and we do not use App data for advertising or for any purpose unrelated to the internal business functions described in Section 4.

12.3 Account and data deletion

An authorised employee (or the Company on their behalf, on separation) may request deletion of the staff account and associated personal data by writing to admin@perfectfinmart.com. Deletion is subject to the retention obligations described in Section 8 (for example, audit trails required for financial-services recordkeeping may be retained in anonymised or archival form).

12.4 Data safety disclosures

A summary of data types collected by the App, mapped to the categories used in Google Play's Data Safety section and Apple's App Privacy (“nutrition label”) disclosures, is provided in Appendix A. This Policy will be kept aligned with the in-store data safety/privacy labels; if you notice any inconsistency, please notify admin@perfectfinmart.com.

13. Third-Party Websites and Services

Our website may link to third-party websites, and the App may integrate third-party infrastructure providers (for example, cloud hosting or SMS/OTP delivery). We are not responsible for the privacy practices of third parties outside our control, and we encourage you to review their privacy policies. This Policy applies only to data we collect directly.

14. Intellectual Property

All content on our website — including text, images, graphics, and audio — is the intellectual property of Perfect Finsec Private Limited or its licensors. You may view and retain a copy for personal, non-commercial use. Reproduction, distribution, or commercial use of this content without our prior written consent is not permitted.

15. Limitation of Liability

To the maximum extent permitted by applicable law, Perfect Finsec Private Limited is not liable for indirect, incidental, or consequential loss arising from your use of, or inability to use, our website or App, except where such loss arises from our own breach of applicable data-protection law, gross negligence, or wilful misconduct. Nothing in this Policy limits any liability that cannot be excluded under applicable Indian law, including the DPDP Act.

16. Governing Law and Jurisdiction

This Policy is governed by the laws of India. Any dispute arising out of or relating to this Policy shall be subject to the exclusive jurisdiction of the courts at Delhi, India. Users accessing our website or App from outside India are responsible for compliance with their local laws.

17. Grievance Officer / Contact for Data Protection Queries

In accordance with the Information Technology Act, 2000, rules made thereunder, and the DPDP Act, the following Grievance Officer may be contacted for any complaint or query relating to this Policy or the processing of your personal data:

Grievance Officer
Perfect Finsec Private Limited
T-24A, Green Park Extension, New Delhi – 110016, India
Email: admin@perfectfinmart.com | Phone: +91 98991 06930 / 011-47722222

[Company action: please insert the named individual designated as Grievance Officer, as required under Indian law, before this Policy is published or submitted to the app stores.]

18. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices, technology, legal requirements, or for other operational reasons. We will post the revised Policy on our website with an updated “Effective Date,” and, for material changes affecting the App, we will provide notice through the App or another reasonable channel before the change takes effect. Continued use of our website, App, or services after a change becomes effective constitutes acceptance of the revised Policy.

19. Contact Us

If you have questions about this Policy or our data practices, please contact us at:

Perfect Finsec Private Limited
T-24A, Green Park Extension, New Delhi – 110016, India
Email: admin@perfectfinmart.com | Phone: +91 98991 06930 / 011-47722222
Website: www.perfectfinmart.com

Appendix A — Data Type Mapping for App Store Disclosures

Use this table as the basis for Google Play's Data Safety form and Apple's App Privacy “nutrition label” for the Perfect Finmart Staff App. Update it if the App's actual data practices change, and keep it consistent with Sections 4 and 12 above.

Data type	Collected	Shared with 3rd parties	Purpose
Name / username	Yes	No	Account management, authentication
Phone number / email	Yes	No	Authentication (OTP), account recovery, verification
Precise location	Yes	No	App functionality (Credit Survey / field work)
Photos / videos / audio	Yes	No	App functionality (survey & case documentation)
Files / documents	Yes	No	App functionality (case documentation)
Customer/case financial data	Yes	No	App functionality, business records, compliance
Device / push token	Yes	No	App functionality (notifications)
App diagnostics / crash logs	Yes	No	Analytics (bug-fixing, security) — not advertising

Data not collected by the App: financial account numbers of staff, health data, government ID numbers of staff (beyond what is used for internal HR/compliance records held outside the App), and advertising identifiers. The App does not sell data and does not use App data for advertising or third-party marketing purposes.

This document was prepared as a working draft to consolidate and update Perfect Finmart's privacy policy for website and app-store publication. It is not a substitute for review by a qualified Indian data-protection / fintech lawyer, particularly regarding RBI digital lending disclosure requirements, NBFC-specific KYC data handling, and the DPDP Act's rules once notified in final form. Please have counsel review before publishing or submitting to Google Play / the App Store.