



Client Data Security

As a part of our “Client Protection Principle” we are committed to maintain privacy of client data. Client documents/information is kept with security at every stage of loan processing, disbursement and during the tenure of the loan. Due accountability has been fixed with every employee who are responsible for collection of client data, documents, photographs etc. Following are the process of dealing with client.

Document security during sourcing and disbursement of loan:

By day 2 of the CGT we collect following proof of identities from each client.

1. **2 joint photographs** of the client and guarantor (of the 2 photographs one is to be affixed in Loan card, and the other on the Client Profile Form)
2. KYC copies for both Client and the Guarantor/nominee. (mandatory)

In no circumstances the concern CIC is authorized to collect additional documents from the client. During the CGT process we educate the client on rational behind collecting the required documents.

During the “2 days-CGT” the concern CIC handling the cluster handles the client documents (the KYC form, CGT form, and loan proposal form as provided by the client) in his custody. Upon completion of CGT the CIC hands over the documents to the EDC In-Charge (EIC). EIC is responsible for the safe custody of all the client documents during the GRT.

Pre disbursement Client data transfer from branch to RO

Upon completion of CGT and GRT the completed set of document goes to Area/Regional Office for data entry followed by Credit Bureau investigation. The same is usually transferred through the Multipurpose Staff or through the EIC. The documents in the cluster file are carefully handed over to the concerned Area MIS Assistant. Typically one MIS Assistant is responsible for the data entry and document management of 3-4 EDCs (1 Area). The MIS Assistant is required to acknowledge the receipt of documents from the Multipurpose Staff or the EIC.

After necessary data entry and check from authorized Credit Bureau the Regional Office confirms about the approval status of the loan to the EDC. The files are then returned back to the respective EDCs through either the EIC or the Multipurpose Staff from the Area/Regional Office.

Post disbursement document store of files

The files are stored at the respective EDCs under the custody of the EIC in a locked almirah. In case the loan is rejected the documents are stored in rejected file rack in the Almirah. In case clients demand return of their photograph and identity proof, with the permission from Area In-Charge we refund the same to the clients.

Authorized persons to access client data

Following persons are authorized to access client data upon approval from Area In-Charge, Division Manager, Regional Manager or COO.

1. Internal auditors of the company.
2. Company appointed external/statutory auditor.
3. Representative from Credit bureau.
4. Representative from Regulator.
5. Management representative of the organization.
6. Bankers who have funded the loan or lending relationship with organization
7. Investors and board of directors of the company.
8. Representative from MFIN or Sa-Dhan identified by senior management of the company.

The Area In-Charge (AIC) of the company is responsible for safe keeping of documents in the region and gives limited accessibility to the above mentioned representatives with necessary approval and instruction.

Documents of closed loan, non active loans, and rejected loans are kept separately and after expiry of stipulated time are destroyed completely.