

Privacy Policy

Welcome to PocketRupree. We always prioritize user privacy and strictly adhere to relevant regulations to properly safeguard all personal data you submit. PocketRupree's developer is PHRENOLOGICAL INFO AUDIT AND APP SOLUTION PRIVATE LIMITED(hereinafter referred to as "we" or "the platform"). We understand your concern and trust regarding your personal information and consider protecting your privacy and security our core responsibility and commitment. This Privacy Policy aims to clearly explain how we collect, use, store, share, and protect your personal information when you use our online cash lending service platform, and clarifies your rights in this regard. We are committed to ensuring that your personal information is strictly confidential and securely handled throughout the entire lending process and service experience through comprehensive measures combining technology and management. Please carefully read and understand the entire contents of this policy before using our services. Once you begin using or continue to use PocketRupree's services, it indicates that you fully understand and agree to our processing of your personal information in accordance with this policy.

Compliance Agency Statement:

In order to ensure that users enjoy standard, transparent and secure credit services, PocketRupree strictly cooperates with compliant NBFCs registered with the Reserve Bank of India. All credit products displayed on the platform are independently issued by licensed institutions with complete financial operating qualifications and abide by RBI supervision and local data compliance regulations. The entire process of information collection, capital flow and customer rights protection is standardized.

Company Name:PHRENOLOGICAL INFO AUDIT AND APP SOLUTION PRIVATE LIMITED

Mail:support@phrenological.com

Official website:<https://phrenological.com/>

The official website of the partner NBFC:<https://allenhf.in/>

I. The specific information collected is as follows:

Personal Identification Information:

To complete RBI-mandated KYC identity verification, assess loan application eligibility, and recommend suitable loan products, we will collect your basic information, including mobile phone number, ID card, email address, and date of birth. This information is primarily used to verify your genuine borrowing identity, ensure loan disbursement, and prevent fraud. This information will only be used for credit review, risk control and fraud prevention, and fulfilling legal archiving obligations. Data will be strictly managed in accordance with the Indian DPDP Act and will not be used for any other purpose. Your information will only circulate compliantly within the licensed NBFC system and will be securely stored in the file upload center <https://dibeep.rupikrapidrupeeiosapp.com/cdnfoldercache> with desensitized encryption, and will be automatically deleted upon expiration.

Contact list information:

When you use PocketRupree for loan services, you will need to select emergency contact information from your address book (including: emergency contact number, emergency contact name, and relationship). We do not obtain this permission; we only select contacts from your address book as emergency contacts to assist with identity verification, risk management, handling of overdue payments, and prevention of fraudulent activities. The collected data is securely uploaded to a local encrypted server (<https://dibeep.rupikrapidrupeeiosapp.com/cdnfoldercache>) for protection. PocketRupree strictly adheres to RBI credit collection guidelines and the DPDP Act. Without your consent, we will not share your data with any unrelated third parties other than the lending institution you applied to, and we will not sell or disclose user data, nor will we use it for advertising, commercial sales, or other unrelated purposes.

Image information

When you use PocketRupree's image upload feature, PocketRupree needs to obtain the uploaded image information (including image details, file size, file type, etc.) to facilitate the uploading of verification materials such as your ID card and income verification documents to complete the KYC process required by regulations and to assist in quickly completing loan eligibility reviews. This ensures the integrity of the function. We will not automatically read irrelevant photos from your album; we will only retrieve the image data that you actively select and upload. All files actively uploaded by users are stored locally (<https://dibeep.rupikrapidrupeeiosapp.com/cdnfoldercache>)

in encrypted form, strictly adhering to the DPDP Act and RBI information management guidelines, and will never be retained, shared, or misappropriated for purposes other than credit risk control.

Camera permissions

When users use the camera for taking photos and facial recognition, we will access the camera function with your explicit authorization. This permission is only used to complete the online video KYC verification required by the RBI, including real-time liveness detection and capture of original documents, to confirm the authenticity of the loan applicant's identity and prevent fraudulent activities such as borrowing money using other people's information. The camera is only temporarily enabled when you actively initiate the verification process, and the access permission will be automatically revoked after the process is completed. It will not silently access the camera feed in the background. The captured image data is stored only on a local encrypted server (<https://dibeep.rupikrapidrupeeiosapp.com/cdnfoldercache>), strictly in accordance with the DPDP Data Protection Act and digital lending regulations. It is only accessible to the risk control and compliance department and will never be used for external sales, sharing with unrelated third parties, or other irrelevant scenarios. You can turn off this permission at any time in your phone's system settings. Turning it off only affects online identity verification and does not interfere with basic credit functions such as repayment and inquiry.

Financial Information

To comply with Indian financial regulations, PocketRupee is required to conduct user credit assessments in accordance with digital lending regulatory guidelines and the DPDP Act. This RBI-registered and licensed NBFC requests access to your financial information. Based on bank statements, income statements, and transaction records, we objectively calculate your actual repayment capacity, preventing financial risks associated with indiscriminate lending. All financial data is obtained only through compliant account aggregation channels and stored encrypted on a local Indian server (<https://dibeep.rupikrapidrupeeiosapp.com/cdnfoldercache>). It is used exclusively for risk control review and regulatory archiving and will not be used for advertising, third-party resale, or other irrelevant scenarios. Data will only be synchronized to compliant credit reporting agencies after your individual authorization. After business is settled, the data will be properly retained and destroyed according to legal limits. You can withdraw your data usage authorization at any time. Closing this permission will only prevent loan approval; it will not affect the normal use of basic functions such as account inquiries and repayments.

Social Account information

When you use PocketRupee's financial services, we need to collect information related to users' social accounts for quick one-click login, supplement basic identity cross-checking, assist in quickly completing the automatic filling of online loan application forms, and simultaneously assist the risk control side in verifying the applicant's true social identity to reduce the risk of fraudulent lending. We strictly follow the data minimization principle of the DPDP Act and only read basic public content such as account numbers, public nicknames, and bound email addresses. We will not access private content such as private messages, photo albums, and friend lists. All social data are independently encrypted and stored on a local server in India (<https://dibeep.rupikrapidrupeeiosapp.com/cdnfoldercache>). Access is limited to the credit review department and will never be used for unrelated purposes. You have the complete right to withdraw social data authorization at any time. Turning off this permission will only prevent you from using quick login and auxiliary risk control verification. Core credit functions such as account inquiry, repayment, and bill viewing will not be affected in any way.

Equipment Information

To improve our service and support quality, we may collect information about user devices, including device model, system version, unique device identifier, network and IP data. This is primarily used to identify devices, block multi-device impersonation, detect fraudulent registrations and loan fraud risks, and simultaneously retain complete operation logs to meet regulatory audit requirements. We strictly adhere to the DPDP Act and digital

lending guidelines to minimize data collection and will not read irrelevant content such as applications, photos, or contacts on the device. All device data is encrypted and stored on servers in India (<https://dibeep.rupikrapidrupeeiosapp.com/cdnfoldercache>), accessible only to our risk control and compliance departments, and will never be used for advertising, external sales, or cross-platform sharing. You can withdraw authorization at any time in the system settings. Disabling authorization only affects risk control verification; basic credit functions such as borrowing, repayment, and bill inquiry will continue to function normally.

IDFA

To accurately match you with credit solutions that suit your repayment ability and funding needs, PocketRupee, as a licensed Indian NBFC lending application, will request to obtain your device's IDFA identifier. This data will only be used to identify fraudulent registrations, intercept multiple borrowing fraud, and push compliant credit information that matches your qualifications. This identifier will not be extracted, sold, or disclosed separately. All data collection activities comply with the Indian DPDP Data Protection Act and RBI Customer Information Management Regulations. You can go to the system settings at any time to turn off the corresponding permissions. Turning them off will only affect personalized product recommendations and will not hinder the use of the core functions of normal borrowing, disbursement, and repayment.

II. Purpose of Information Collection

We collect your information to provide you with safe, efficient, and personalized cash lending services, based on the principles of legality, legitimacy, and necessity. Specifically, information collection is primarily for the following core purposes: to complete identity verification and account security protection; to conduct credit assessment and risk control to determine appropriate credit granting schemes; to provide full-process services including loan application, disbursement, and repayment; to optimize product functions and user experience after anonymization; to fulfill legal obligations such as anti-money laundering and prevent security risks; and to provide customer support and dispute resolution. We promise that all information collection is directly related to the above purposes and will not be used for any other unrelated purposes. Any changes will be made with your explicit consent in advance.

III. How We Use Your Information

We strictly adhere to the law and this policy, using your information only within the scope of your authorization.

The core uses are as follows:

Providing and Operating Services:** For core lending processes such as identity verification, credit assessment, loan approval and disbursement, repayment deductions, and account management.

Risk Control and Security:** For monitoring and preventing illegal activities such as fraud and money laundering, ensuring the security of your account and transactions.

Optimizing Experience and Communication:** To improve product functionality after anonymization; to send necessary service notifications and repayment reminders through your contact information.

Fulfilling Legal Obligations:** To meet compliance requirements such as anti-money laundering, tax reporting, and cooperation with regulatory investigations.

Other Uses with Your Consent:** If use exceeds the above scope, we will obtain your explicit authorization in advance.

We promise that your information will only be used to achieve the relevant purposes and will take strict measures to protect it.

IV. Cookies

To ensure the secure and stable operation of the PocketRupee platform and to provide you with a smoother, more personalized service experience, we will use cookies and similar technologies on your device. These technologies are primarily used to: verify identity to ensure account and transaction security, maintain the normal operation of basic website functions, and remember your preferences to optimize your browsing experience. You can manage cookies through your browser settings, but please note that disabling certain necessary technologies may affect the

use of some core functions. We promise that such technologies are only used to improve service quality and security and will not be used for any other purpose beyond this policy statement.

V. Privacy Policy Changes and Notifications

PocketRupee may revise this Privacy Policy from time to time to adapt to business development, technological updates, or changes in laws and regulations. If an update results in a substantial reduction of your rights under this policy, we will notify you in advance through prominent means such as platform announcements, push notifications, SMS, or emails, explaining the specific changes. Your continued use of PocketRupee's services after this policy update takes effect indicates that you have fully read, understood, and accepted the updated policy. We recommend that you review this policy regularly to understand how we protect your personal information. The latest update date will be indicated at the top of the policy text.

VI. Intellectual Property Protection

All intellectual property rights contained in the PocketRupee platform (including but not limited to the website, mobile applications, brand logo, interface design, source code, database, technical solutions, and all content), including trademark rights, patent rights, copyrights, trade secrets, and related rights, belong to PocketRupee and/or its rights holders. Without our prior express written authorization, no individual or organization may reproduce, reprint, modify, disseminate, reverse engineer, commercially use, or use it for any other purpose in any form. You may only access and use the functions and services provided by the platform for the legal purpose of using this service, subject to compliance with the User Agreement and all applicable laws. We respect the intellectual property rights of others and remind users to adhere to the same principles when using the service. If you believe that the platform content infringes upon your legitimate rights, please contact us through the contact information listed in this policy.

VII. App Function Introduction

The PocketRupee App is your professional mobile cash lending partner, committed to providing a safe, convenient, and intelligent financial service experience. Through the app, you can easily complete the entire online application process, receive real-time intelligent credit approval, borrow flexibly, and repay with one click, enjoying customized credit limits and terms. We offer full-process progress tracking, electronic contract management, and intelligent repayment reminders to ensure your operations are clear and worry-free. The platform uses bank-grade encryption technology to fully protect your account and information security. PocketRupee, making trustworthy lending services readily available.

VIII. Protection of Minors

PocketRupee is committed to protecting the privacy and safety of minors. Our services are only available to users who are 18 years of age or older, or who meet the legal age of majority in their local jurisdiction. We will not knowingly collect personal information from minors. If you are a guardian and discover that a minor has provided us with information without their consent, please contact us immediately so that we can verify and remove it. If we need to process a minor's information for legal or specific purposes, we will strictly adhere to the principle of necessity and ensure that we obtain the explicit consent of the guardian in advance. We encourage parents and guardians to work together to guide minors in the safe use of online services.

IX. How We Store Your Personal Information

We strictly comply with relevant laws and data protection regulations, and take necessary technical and management measures such as encryption and access control to protect your personal information. The storage period for information is limited to what is necessary to achieve the purposes described in this policy, while also complying with legal obligations. When the storage purpose is achieved, the storage period expires, or you request deletion and there is no legal obligation to retain it, we will securely delete or anonymize your personal information. For cross-border data transfers, we will ensure that the recipient provides adequate protection in accordance with the law and obtain your prior consent.

X. Data Access and Deletion

At PocketRupee, you have the right to access and delete the personal information we collect. The specific process is as follows:

Data Access: You can request access to the personal information we store about you at any time. We will provide a copy of the relevant data according to your request so that you can verify the information we hold.

Data Deletion: You have the right to request the deletion of your personal information. Subject to legal and compliance requirements, we will process your deletion request as soon as possible.

Request Methods: Please contact us through the following methods to submit a data access or deletion request:

Email: support@phrenological.com

Online Customer Service: Visit our website and use the online chat function to communicate with a customer service representative.

Identity Verification: To protect your privacy, we may require you to provide identity verification information to confirm the identity of the requester.

We value your data rights and will do our best to meet your requests. If you have any questions, please feel free to contact us.

XI. How to Protect Your Data Security

At PocketRupree, we take multiple measures to ensure your data security:

We employ strict technical and management measures to protect your data security, including using encryption technology to protect data transmission and storage, deploying firewalls and other security systems to prevent cyberattacks, implementing tiered access control and operational auditing, establishing internal security management systems, and conducting employee training. Furthermore, we have established a security incident emergency response mechanism, and will promptly notify you in accordance with the law should a data security incident occur. Please also safeguard your personal account information properly to jointly maintain data security.

XII. Developer Company Introduction

PocketRupree, developed and operated by PHRENOLOGICAL INFO AUDIT AND APP SOLUTION PRIVATE LIMITED, is a fintech company focused on the Indian market. We are committed to providing compliant, convenient, and transparent digital lending services to Indian users through technological innovation and data intelligence. Since our inception, we have always focused on user needs, relying on advanced risk control models and a secure platform architecture to provide users with efficient online lending solutions. Our team consists of senior experts in finance, technology, and risk control, adhering to the concept of "technology-driven financial inclusion," and strictly complying with the Reserve Bank of India (RBI) and related laws and regulations to ensure the security and compliance of our services.

In the future, we will continue to deepen our localized service capabilities, explore more financial products tailored to the needs of Indian users, and help more people achieve more flexible financial planning.

XIII. User Rights and Obligations

When using PocketRupree's services, users have the following rights:

Right to Know: Users have the right to know all information related to their borrowing, including loan terms, interest rates, fees, etc.

Right to Privacy: Users' personal information and data will be strictly protected and will not be shared or disclosed without the user's consent.

Right to Service: Users have the right to receive professional and timely service support and to raise any questions or suggestions.

Meanwhile, users also have the following obligations:

Provide Accurate Information: Users must provide accurate and truthful personal and financial information so that we can match them with suitable loan products.

Comply with the Agreement: Users must comply with the platform's terms of use and relevant laws and regulations to ensure legal use of the services.

Protect Account Security: Users should properly safeguard their account information and passwords to prevent unauthorized access.

Through our platform, users and we share responsibility to ensure the smooth and secure lending process.

XIV. Information Sharing Instructions

All information we collect is strictly used to provide you with loan application services and optimize product experience. We solemnly promise that we will never share, sell or disclose your personal data to any unrelated third party.

When necessary, we will only share data with the following authorized objects: your designated lending institutions, cooperative financial institutions, third-party service providers that provide technical support, and affiliated companies and internal staff of this platform. We will conduct strict compliance reviews on all data recipients and ensure that they handle your information in accordance with agreed purposes and security standards. The "unrelated third parties" referred to in this policy specifically refer to any external organization or individual not directly related to your loan application process.

In order to improve service quality, we have accessed some third-party analysis tools, which may collect indirect personal information such as device identifiers for advertising effectiveness evaluation and product optimization. We always give top priority to data security and user privacy, and all data sharing behaviors follow the minimum necessary principle and strictly comply with the requirements of relevant laws and regulations.

XV. Contact us

If you have any questions, comments, or suggestions about this Privacy Policy, PocketRupree's personal information processing practices, or need to exercise your rights related to personal information, please contact us through the following methods:

Email: support@phrenological.com

Working hours: 8:30 am to 18:30

Address: Shop No.270, Sahara Shopping Centre, Lekhraj Market, Faizabad Road, LUCKNOW, Uttar Pradesh, India - 226016.