

# PRIVACY POLICY of Fastrupee Pvt Ltd

Users (hereinafter referred to as "User", individually, and "Users", collectively) of the website [Fastruppe.lk/sl](http://Fastruppe.lk/sl) and [fastrupee.lk/en](http://fastrupee.lk/en) (hereinafter referred to as "Website") are provided with the suitable technical resources so that, prior to the voluntary completion of User Data, Users can access this Privacy Policy and any other relevant information on the Protection of User Data.

This Privacy Policy is applicable to any User of the Website through any of its features processes, functions and its related services including, but not limited to, loan applications ("Services") to Fastrupee Pvt. (hereinafter referred to as "Fastrupee"), hence Users are instructed to review it from time to time for updates that are effected on a regular basis.

The User is advised to read this Privacy Policy carefully because use of the Website indicates that the User consents to the Website's usage of the User's Data.

## 1. GENERAL TERMS

- a. This Privacy Policy is binding in relation to all User Data received by Fastrupee from the natural person holding such User data at the time of using or attempting to use the services of Fastrupee, including contracting loans.
- b. User accepts this Privacy Policy through the use of the website and gives consent for the collection, processing, storage and transmission of the User's Data in the formats prescribed by the applicable Sri Lanka laws and regulations as well as this Privacy Policy.
- c. The purpose of this Privacy Policy is to inform the Users of their right to privacy to the User Data in relation to the collection, use, storage, processing, disclosure, security and eventual destruction of such Data by Fastrupee.

## 2. USER DATA

- a. Collection of User Data is done through several sources:
  - i. by virtue of the registration on the Website;
  - ii. upon completing the online loan application form;
  - iii. by virtue of communication with Fastrupee employees;
  - iv. by virtue of credit reports and data; and,
  - v. by virtue of navigation through the Website;
  - vi. upon completing the loan application form via Mobile App.
- b. User Data are both Personal and Non-Personal Information:
  - i. Personal Information is any information from which the identity of a User can be reasonably and directly ascertained, or when put together with other information would directly and certainly identify an individual, such as name, gender, date of birth, address, telephone/mobile number, email address, proof of identification, etc. It also includes information about:
    1. the data that would help Fastrupee evaluate the User's credit standing such as spouse details financial details, business details, and other data points whenever applicable;
    2. the location of the User's device, whether desktop, laptop, or mobile devices, as used to access the Website; and
    3. the User's navigation experience when accessing the Website to see activities done in the Website, the pages visited, and the sequence thereof.
  - ii. Non-Personal Information is any information that does not identify the User individually, and includes statistical and analytical data, and anonymous and aggregate reports.
  - iii. The User may also be requested to update Personal Information from time to time. Should the User be unable to supply the required Personal Information, Fastrupee may be unable to provide the User with requested products and services and updates on the latest offerings. The User may also be unable to participate in Fastrupee events, promotions or other activities.
  - iv. Depending on the User's device or Internet browser settings, when Users access the Website and electronically communicate with Fastrupee, Fastrupee may use cookies, web beacons, small data text files or similar technologies to identify the User's devices and record the User's preferences, with the User's consent.
  - v. The User has the duty to inform Fastrupee of any change in the information provided, in order to keep it updated and avoid errors.
  - vi. If the User uses our Website or Services in place of other people, such as family, friends or employees, User must ensure that he is authorized to provide Fastrupee with their Personal Information. Use of the Website in this manner automatically presumes that User has

obtained proper authorization from the owner/s of the Personal Information and have informed said person/s of this Privacy Policy. User hereby represents and warrants that all family, friends or employees whose personal information User has provided to Fastrupee have agreed to the use, processing, storage and/or disclosure of their data in accordance with this policy and all applicable laws.

- vii. Information our servers automatically collect when you access the App, such as your native actions that are integral to the App, actions taken when creating entries, editing entries and uploading media to the App. As such, we may also request access to your device's photo roll or camera in order for us to upload your media to the App. Any media uploaded in this fashion, will be collected and stored on our servers. If you wish to change our access or permissions, you may do so in your device's settings.
- viii. We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the App, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
- ix. We may request access or permission to certain features from your mobile device, including the list of installed applications, your mobile device's reminders, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- x. Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.
- xi. We may request to send you push notifications regarding your account or the App. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.
- xii. Personal and other information you may provide when entering contests or giveaways and/or responding to surveys.

### 3. USER CONSENT AND USE OF INFORMATION

- a. User consent is a pre-requisite for the availment of the Services. If the User chooses not to provide Fastrupee with any Personal Information required from User, Fastrupee reserves the right to refuse User request for, or the continuation of, any of the Services.
- b. The User may withdraw consent to the collection, processing and/or storage of any Personal Information, provided that any and all legal obligation is settled.
- c. Having accurate information about the user permits us to provide the user with a smooth, efficient, and customized experience. Specifically, we may use information collected about the user via the App to:
  - i. Generate a personal profile about the user to make future visits to the App more personalized.
  - ii. Monitor and analyze usage and trends to improve your experience with the App.
  - iii. Notify you of updates to the App or Site.
  - iv. Request feedback and contact user about user's use of the App.
  - v. To improve our website and product
  - vi. We may periodically send promotional emails about new products, special offers or other information which we think user may find interesting using the email address which user have provided.

### 4. USER DATA PROCESSING

- a. Without limitation to the foregoing, User data may be processed by Fastrupee among others for the following purposes:
  - i. Verify the User's identity;
  - ii. Manage the provision of services being offered by the Website, such as processing the loan application or rendering the loan credit decision, among others;
  - iii. Evaluate the User's credit standing through external credit report providers and bureaus;
  - iv. Contact the User;
  - v. Transfer the loan proceeds;
  - vi. Manage and recover outstanding debt;
  - vii. Update the information regarding the loan granted;
  - viii. Enhance the User's customer experience and improve, develop and determine customized products to meet customer preferences and needs;
  - ix. Send commercial communications on the products and services;
  - x. Improve the service and contents of the service through statistical analysis and market research;
  - xi. Abide by any safety, security, public service or legal requirements and processes;
  - xii. Process information for statistical, analytical, and research purposes;

- xiii. Any other purpose expressly provided in the Loan Application Form and/or in the General Terms and Conditions as well as in the Promissory Note / Disclosure Statement; and
  - xiv. Other specified and legitimate purposes determined and declared before, or as soon as reasonably practicable after collection of the Personal Information
- b. Fastrupee also uses the User's Non-Personal Information for statistical, analytical, and research purposes to create anonymous and aggregate reports.
  - c. User consents that Fastrupee maintains the data provided even when the loan application has not been accepted, in order to ensure compliance with legal obligations and avoid duplication in the new applications treatment.
  - d. Fastrupee outsources or contracts the processing of User Data to third parties, such as but not limited to the following parties: vendors, service providers, partners or other telecommunications operators, to fulfill any of the above purposes. These parties are only authorized to use User Data for such contracted purposes. These parties may have access to User Data for a limited time under reasonable contractual and technical safeguards to limit their use of such information. Fastrupee requires these parties to protect User Data in compliance with this Privacy Policy.
  - e. Fastrupee does not share User Personal Information with any third parties for their business purposes, such as, including without limitation, marketing and advertising without User's express consent and authorization.
5. THIRD-PARTY LINKS AND OTHER COMPANIES / ORGANIZATIONS
- a. Links to other websites (i.e. third-party links) may appear on which have its own privacy policy and are understood as accepted by clicking on them. This Privacy Policy does not apply to such third-party links that may appear on the Website. The responsibility of Fastrupee with regards to the User's Data extends only to the Website proper.
  - b. This Privacy Policy also does not regulate the data processing activities of other companies and organizations that advertise Fastrupee 's services.

6. SHARING AND DISCLOSURE OF PERSONAL INFORMATION

Fastrupee may share your Personal Information with third-parties, which includes, but is not limited to the following entities:

- a. Affiliates and/or Members of the corporate family, including subsidiaries, to assist in providing the Services listed in the Website, to help detect and prevent potentially illegal acts and violations of our policies, and to provide proper data analytics on the use of the Website, including marketing communications;
- b. Courts of Law, government officials, law enforcement, or other regulators in relation to a subpoena, court order, or other legal process or requirement under Sri Lanka law or regulation, when Fastrupee needs to do so to comply with such law or regulation, or when Fastrupee believes, in its sole discretion, that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, or to report suspected illegal activity or investigate violations of our Terms and Conditions;
- c. Credit bureaus and collection agencies to report account information, as permitted by law.
- d. Customer support for customer service purposes;
- e. Banking or financial partners, as permitted by law or as required by the contractual business relationship;
- f. Legal department, to ensure compliance with government rules and regulations and to protect us against harm to the rights, property, or safety, the other users of the Website or the public, as required or permitted by law;
- g. Service Providers, to enable service providers under contract with Fastrupee to support our business operations, such as fraud prevention, bill collection, marketing, customer service and technology services.
- h. The User agrees that Fastrupee, directly or through its Partners, may collect, retrieve, process, use and store his/her personal data such as name, age, photographs, fingerprints, other biometric data (e.g., facial recognition and voice recognition), mobile number/s, mobile phone usage data, employment details, income, financial data, financial profile, credit standing, loan payment history, installed mobile applications list (in the case of Fastrupee Mobile App usage), and other information required in the application form for the purpose of reviewing and processing the User's loan application. The User consents to the collection of his/her personal data from the User her/himself, or from other personal information controllers such as, but not limited to, telecommunications companies like Dialog and Lankabell or another authorized provider, for credit scoring purposes. The User's personal data such as mobile number, email address, address, and telco score, will be shared to a credit scoring service provider for credit investigation, credit scoring, data analytics, and data profiling, which includes the regular updating of the User's credit score. The personal data secured may also be used for direct marketing of products and services of Partners.

Please note that some of these third parties may be located in other countries with different rules and regulations on processing personal information. By agreeing to this Privacy Policy you acknowledge that Personal Information can be transferred cross-border to other countries and you are consenting to such transfer.

Throughout the processing of the User's personal data, his/her rights under the Laws such as the (1) right to be informed, (2) right to object, (3) right to access, (4) right to rectification, (5) right to erasure or blocking, and (6) right to damages, shall be upheld. Entities to whom we share your data will also respect the same rights.

## 7. COOKIES AND WEB BEACONS

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the App to help customize the App and improve user experience. For more information on how we use cookies, please refer to our Cookie Policy posted on the App, which is incorporated into this Privacy Policy. By using the App, user agree to be bound by our Cookie Policy.

## 8. THIRD-PARTY WEBSITES

The App may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once user have used these links to leave the App, any information user provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of user information. Before visiting and providing any information to any third-party websites, user should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the App. User should exercise caution and look at the privacy statement applicable to the website in question.

## 9. SPECIAL NOTICE – MINORS

Use of the Website is not aimed at persons under 18 years old and Fastrupee will not collect, use, provide or process in any other form any personal information of persons under the age of 18 deliberately.

We therefore also ask the User, if under 18 years old, please do not send us personal information (for example, your name, address and email address). If User is under 18 years old and nevertheless wish to ask a question or use this Website in anyway which requires you to submit personal information please get your parent or guardian to do so on your behalf.

## 10. ACCURACY OF PERSONAL INFORMATION

If the User would like to review, change or delete any Personal Information supplied to Fastrupee, please contact Fastrupee immediately using the contact of the Data Protection Information officer listed below.

## 11. PERSONAL INFORMATION STORAGE

Fastrupee will retain your Personal Information as long as you are a User or no longer that it is necessary and relevant for the Services. Fastrupee may also retain Personal Information to comply with the requirements of any laws and regulations, to prevent fraud, to resolve disputes and various troubleshoot problems, and to take other actions permitted or required by applicable laws and regulations. Under our data policies, we will dispose Personal Information in a secured manner and in accordance with applicable laws and regulations, after such Personal Information is no longer necessary and ceases to be relevant for our Services, unless applicable laws and regulations require otherwise, or unless the requested by the user in writing.

## 12. SECURITY

Security of User's Personal Information is Fastrupee priority. Except as indicated in this Privacy Policy, Fastrupee will not disclose User's Personal Information to third parties without User's express consent. Further, Fastrupee will take all reasonable procedures and exert our best efforts to ensure all Personal Information received shall be kept confidential and secure, whether online or offline. Fastrupee will protect User's Personal Information using a variety of technical and administrative security measures to reduce the risks of loss, misuse, unauthorized

access, disclosure and alteration. Fastrupee may use and amend from time to time various security measures, as new technology becomes available, as appropriate, such as firewalls and data encryption, access controls to data centers.

### 13. MOBILE ACCESSIBILITY

Fastrupee may offer User the ability to connect with our Services using a mobile device, either through a mobile application or via a mobile optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices.

Fastrupee may request access or permission to certain features from your mobile device, including the list of installed apps, user mobile device's reminders, and other features. If you wish to change our access or permissions, user may do so in user device's settings.

### 14. USER CONFIDENTIALITY

To further secure the privacy of your Personal Information, we advise to keep your any account details confidential at all times.

### 15. PRIVACY POLICY UPDATES

Fastrupee may update or amend this Privacy Policy from time to time by posting a revised version on the Website. User is advised to review this Privacy Policy periodically for the latest information. Changes to this Privacy Policy are effective from the date of posting. If Fastrupee makes any substantial changes to this Privacy Policy and the way in which Fastrupee will use your Personal Information, Fastrupee will post these changes on the Website and will do its best to notify User of any significant changes. By continuing to use our Services, User accepts and consents to the updated terms of this Privacy Policy.

### 16. INQUIRIES AND COMPLAINTS

If the User believes his account or any personal data may have been misused or abused, or if the User believes that the security and protection of his/her respective personal data may have been compromised, User may lodge inquiries and complaints to the Contact Information below and briefly discuss such matter, together with User's contact details for reference.

If the User is not satisfied with the manner of how the complaint was handled, or if User still believes that there exists a threat of breach of his/her Personal Information, User may directly lodge your complaint with the National Privacy Commission.

### 17. CONTACTS

User can review and change user personal information by logging into user profile through the website or App and visiting user account profile page or settings page. User may also send us an e-mail at [info@fastrupee.lk](mailto:info@fastrupee.lk) to request access to, correct or delete any personal information that user have provided to us. We may not be able to delete user personal information except by also deleting your user account. We also may not accommodate a request to change information if we believe the change would violate any law or legal requirement, or cause the information to be incorrect. Upon user request to terminate user account, we will deactivate or delete user account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

For any concern regarding the User's personal data, the duly-designated Data Protection Officer of Fastrupee may be contacted, as follows:

Email: [info@fastrupee.lk](mailto:info@fastrupee.lk)

Contact Number: 011 77 49 444

ලිපිනය: No.278, Union Place, Colombo 02, Access tower 5<sup>th</sup> floor