

ART Venture Finance (India) Private Limited

Privacy Policy

Version: AVF/FY-26-27/MAY/PRIVACY POLICY | Effective Date: 1st July 2026

Prepared By	Secretarial Department
Reviewed By	[Name / Role]
Approved By	[Name / Role]

Version History:

Version	Date	Description of Changes	Next Review Date
1	20.05.2026	First Version	As and when required
2	[Date]	NBFC-ICC specific data categories, RBI/PMLA obligations, breach notification, data localisation, children's data prohibition added	[Date]

Disclaimer:

The information contained in this document is confidential and intended solely for the company, its employees, and authorised representatives of ART Venture Finance (India) Private Limited. Access to this document by anyone else is unauthorised. Any use, distribution, printing, dissemination, copying, disclosure, or other use of this document by any other person is strictly prohibited and may be illegal.

Privacy Policy

This Privacy Policy explains how ART Venture Finance (India) Private Limited (hereinafter referred to as "ART Venture", "we", "us", or "our") collects, uses, discloses, and safeguards personal data obtained through our website www.artventurefinance.in ("Website") and through our financing and investment activities, in accordance with applicable Indian data protection laws — including the Digital Personal Data Protection Act, 2023 ("DPDP Act") and the Digital Personal Data Protection Rules, 2025 ("DPDP Rules") — as well as the applicable directions and master circulars of the Reserve Bank of India ("RBI").

ART Venture Finance is registered as an NBFC-ICC (Investment and Credit Company) with the Reserve Bank of India. As a regulated financial entity, we are subject to data governance obligations under both the DPDP Act and RBI's IT Framework for NBFCs, and we are committed to meeting both.

By accessing or using this Website and submitting your personal data to us — whether as a borrower, investee company, co-investor, or website visitor — you consent to the collection, processing, storage, and use of your data in accordance with this Privacy Policy.

1. Data We Collect

We may collect the following categories of personal data, depending on the nature of your interaction with us:

A. Website Visitors

- Full name, email address, and contact number
- IP address and browser or device details
- Any information voluntarily submitted via enquiry or application forms on the Website

B. Founders, Borrowers, and Investee Companies

- Identity documents — PAN, Aadhaar (where voluntarily provided), passport, or other government-issued identification
- KYC and CKYC data, as required under RBI Master Direction on Know Your Customer (KYC), 2016
- Financial information — bank statements, audited financials, MIS reports, revenue data, and credit bureau reports (including CIBIL, Experian, Equifax, or CRIF High Mark)
- Business and legal documentation — incorporation certificates, cap table, shareholder agreements, and board resolutions
- Due diligence materials submitted in connection with an application for equity, convertible financing, or alternative lending
- Investment-related correspondence and executed transaction documents

C. Co-Investors and Partners

- Name, designation, and contact details
- Firm name and regulatory registration details
- Transaction-related communications and documents

2. Legal Basis and Consent

Under the DPDP Act, 2023, and applicable RBI directions:

- Your consent is the primary basis for processing your personal data collected through this Website.
- By providing your personal data on this Website or in connection with a financing transaction, you are deemed to have given free, informed, specific, and unambiguous consent to ART Venture for using such data for the purposes outlined in this Policy.
- For certain processing activities — including credit bureau pulls, CKYC verification, and regulatory reporting — we may process your data on the basis of a legal obligation or legitimate use, as permitted under the DPDP Act and applicable RBI directions, without requiring a separate consent.
- You may withdraw your consent at any time by contacting our Grievance Officer (details in Section 9). Please note that withdrawal of consent may affect our ability to provide or continue financing services to you. It will not, however, affect processing already carried out on the basis of your prior consent, or processing required to fulfil a legal obligation.

3. Use of Collected Information

We may use your personal data for the following purposes:

- To evaluate and process applications for equity investment, convertible financing, or alternative lending
- To conduct business, financial, and legal due diligence in connection with a proposed transaction
- To pull credit bureau reports (CIBIL and others), with your explicit prior consent
- To comply with KYC, CKYC, AML, and PMLA obligations as required by the RBI and the Financial Intelligence Unit — India (FIU-IND)
- To manage and monitor existing investment and lending relationships, including reviewing MIS, financial updates, and covenant compliance

- To respond to your queries or requests submitted via the Website
- For internal operations, risk assessment, and administrative purposes
- To comply with legal obligations, regulatory reporting requirements, and court orders

We may also use de-identified and aggregated data for analytics, portfolio reporting, and service improvement purposes, provided such data cannot be used to identify any individual.

4. Disclosure to Third Parties

We do not sell or rent your personal data. We may share your data only in the following circumstances:

- With your explicit consent
- With credit bureaus (CIBIL, Experian, Equifax, CRIF High Mark) for credit assessment, with your prior consent
- With co-investors, advisors, and legal counsel engaged in connection with a specific transaction, subject to confidentiality obligations
- With authorised third-party service providers (including technology vendors, KYC verification platforms, and account aggregators) who process data on our behalf under contractual obligations
- With the Reserve Bank of India, Financial Intelligence Unit — India (FIU-IND), SEBI, DPIIT, or any other competent regulatory authority, as required by applicable law
- As required by court order, law enforcement authority, or other legal process
- To protect our rights, assets, or safety, or the rights and safety of our portfolio companies and co-investors

Any third party with whom we share data is required to process it only for the specified purpose and to maintain appropriate security and confidentiality standards.

5. Data Localisation

In compliance with the Reserve Bank of India's data localisation requirements, all personal data and financial data of Indian residents collected by ART Venture is stored exclusively on servers and systems located within India. We do not transfer personal data to servers outside India without the explicit consent of the data principal, and only to the extent permitted under applicable law and RBI directions.

6. Your Rights Under the DPDP Act, 2023

As a Data Principal under the DPDP Act, 2023, you have the following rights with respect to your personal data held by ART Venture:

- Right to Access: You may request a summary of the personal data we hold about you and the purposes for which it is being processed.
- Right to Correction and Updation: You may request correction, completion, or updating of any inaccurate or incomplete personal data.
- Right to Erasure: You may request deletion of your personal data where it is no longer necessary for the purpose for which it was collected, subject to any overriding legal or regulatory obligation to retain it (including RBI KYC norms and PMLA requirements).
- Right to Grievance Redressal: You may contact our Grievance Officer for resolution of any complaints regarding your personal data.
- Right to Nominate: You may nominate an individual to exercise your data rights in the event of your death or incapacity, in accordance with the DPDP Act.

To exercise any of the above rights, please contact our Grievance Officer at the details provided in Section 10.

7. Children's Data

ART Venture does not knowingly collect, process, or store personal data of individuals below the age of 18 years. Our financing and investment services are directed solely at businesses and their adult founders, representatives, and officers. If we become aware that personal data of a minor has been inadvertently collected, we will promptly delete it.

In accordance with Section 9 of the DPDP Act, 2023, we will obtain verifiable consent from a parent or lawful guardian before processing any personal data of a child, in the unlikely event that such data is relevant to our operations.

8. Cookie Policy

Our Website uses cookies and similar tracking technologies to enhance your browsing experience. These cookies help us:

- Recognise returning users and maintain session continuity
- Understand usage patterns and improve Website functionality
- Remember user preferences

We do not use cookies to collect sensitive personal or financial data. You can manage or disable cookies through your browser settings. Please note that disabling certain cookies may impact your experience on our Website. We do not use cookies for targeted advertising or for sharing data with third-party advertisers.

9. Data Retention and Security

We retain your personal data only for as long as is necessary for the purpose for which it was collected, or as required under applicable law. Specifically:

- KYC and identity documents are retained for a minimum of 5 years from the date of the last transaction, or longer as required under RBI's KYC Master Direction and the Prevention of Money Laundering Act, 2002 (PMLA).
- Transaction records, loan documents, and investment-related correspondence are retained for a minimum of 8 years from the closure of the transaction, in line with PMLA record-keeping requirements.
- Website enquiry data and non-transactional correspondence are retained for a maximum of 3 years from collection, unless you request earlier deletion.

We implement appropriate technical and organisational security measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction. These measures include access controls, encrypted storage, and regular security reviews. However, no online platform or system can guarantee absolute security, and we encourage you to exercise caution when sharing sensitive information electronically.

10. Data Breach Notification

In the event of a personal data breach that is likely to result in risk to the rights of Data Principals, ART Venture will notify the Data Protection Board of India in accordance with the timelines and procedures prescribed under the DPDP Rules, 2025.

Where the breach is likely to affect your rights or interests as a Data Principal, we will also notify you directly through the contact details you have provided to us, with information on the nature of the breach, the data affected, and the remedial steps being taken.

11. Third-Party Links

Our Website may contain links to third-party websites, including the websites of the ART Group entities, co-investors, regulatory bodies, or other partners. We are not responsible for the privacy practices, security standards, or content of those external websites. Users are encouraged to review the privacy policies of any external sites they visit before providing any personal data.

12. Grievance Officer

In compliance with the DPDP Act, 2023, and applicable RBI directions, ART Venture has designated a Grievance Officer for the purpose of addressing concerns, complaints, and requests related to personal data. You may contact the Grievance Officer at:

Grievance Officer

Name: Karuna Sharma

Designation: Company Secretary & Compliance Officer

Email: karuna.sharma@artventurefinance.in

Address: First Floor, 49, Udyog Vihar, Phase IV, Gurugram — 122015, Haryana

Phone: +91-124-6622200

Response Time: Within 7 working days of receipt of a complaint or request

If you are not satisfied with the response of the Grievance Officer, you may escalate the matter to the Data Protection Board of India, once it is constituted and operational under the DPDP Act, 2023.

13. Changes to This Privacy Policy

We reserve the right to update or amend this Privacy Policy at any time to reflect changes in applicable law, regulatory requirements, or our data processing practices. Any changes will be reflected on this page with an updated effective date and version number. Continued use of the Website or our services after changes are published constitutes your acceptance of the revised Policy.

Material changes — particularly those that affect your rights or the purposes for which we process your data — will be communicated to you directly through the contact details you have provided, where practicable.

14. Contact Us

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

ART Venture Finance (India) Private Limited

Corporate Office: First Floor, 49, Udyog Vihar, Phase IV, Gurugram — 122015, Haryana

Registered Office: 107, Best Sky Tower, Netaji Subhash Place, Pitampura, New Delhi — 110034

Email: contact@artventurefinance.in

Phone: +91-124-5060981

Website: www.artventurefinance.in

CIN: U74899DL1987PTC026954

This document should be reviewed by qualified legal counsel before publication. It does not constitute legal advice.