

The Pandharpur Merchants Co-Op. Bank Ltd., Pandharpur

Data Privacy Policy

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Version: 1.0

Policy Owner: Board of Directors of PMCB

Approved By: Board of Directors of PMCB

Author: IT Manager

1. Introduction

At The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur, our main concern is the accountable use of information that users and clients share and disclose to us. The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur commitment towards guaranteed confidentiality and privacy at all times is clearly stated in our Privacy Policy. We are dedicated to protecting all customers' and employees' personal data and will take all reasonable measures to ensure that the information customers provide is processed securely.

This Policy applies to a non-customer who has provided information to the Bank by any means, whether or not with the intention of establishing a relationship of any kind with the Bank. By sharing your information with us, users acknowledge and agree to the terms of this Privacy Policy, which is designed to safeguard the data and ensure it is handled securely and in accordance with applicable Personal Digital Data Protection 2023 and other related laws.

2. PURPOSE

The purpose of a bank's data privacy policy is to outline exactly how our personal and financial information is collected, used, protected, and shared. It builds customer trust by ensuring financial transparency.

Core objectives include:

- **Safeguarding Data:** Outlines security measures (like encryption and role-based access control) used to protect our sensitive financial details.
- **Controlling Information Sharing:** Specifies exactly when and with whom our data is shared, such as with fraud prevention agencies, affiliates, or tax authorities.
- **Ensuring Compliance:** Guarantees the bank adheres to strict RBI and Digital Personal Data Protection Act 2023, IT Act 2000, and other regulatory laws.
- **Managing Consent:** Defines how we can opt in or out of marketing communications and how to withdraw customer consent for specific data usage.

3. Scope

This policy applies to all employees, contractors, vendors, and third-party agents who have access to data systems owned, managed, or leased by The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur.

4. Collecting Customer / Personal Information

We collect information that customers provide to us voluntarily, and we also collect information from customers on a consent-based basis. However, The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur will not share any user information with third parties without informing them at the time of collection or obtaining their explicit consent, except for the purposes and circumstances outlined in this Policy.

We collect personally identifiable information (PII) from employees and customers, which includes:

- Name
- E-Mail address
- PAN
- Aadhaar
- Telephone Number
- Mobile Number
- Bank Account Number
- Demographic information, etc.

The collected information also includes, without limitation, users' preferences regarding receiving marketing messages from our service providers and us, as well as users' communication preferences. The Bank ensures that personal data is collected exclusively for lawful and specified purposes and is protected against unauthorised access, misuse, or breaches.

As per this policy, information that is readily available or accessible in the public domain, or disclosed under the Right to Information Act of 2005, or any other applicable law, will not be considered sensitive personal data or information.

The collected information will be used lawfully for various functions or activities of the Bank related to services in which the User is interested, to help determine the User's eligibility for requested products/services, to facilitate User verification and application processing, transactions, and record maintenance in compliance with internal/legal/regulatory requirements. The information collected will be utilised to provide the User with the best possible services/products while also protecting the Bank's interests. Customer Information may be processed on lawful grounds, including consent, contractual necessity for providing banking/financial services, compliance with legal or regulatory obligations, or other legitimate purposes permitted under applicable law.

Users shall ensure that all Personal Information provided to the Bank is accurate, up to date, and true. Users will be responsible for any errors, discrepancies, or inaccuracies in the Personal Information they share with us, except for such Customer Information that has been verified through KYC processes set out by applicable law and backed by documentary proof.

5. Right to Grievance Redressal

Users have the right to accessible grievance redressal mechanisms for any concerns relating to the Bank's handling of their personal data or the exercise of their data protection rights under applicable data privacy laws. The Bank has a dedicated privacy governance structure with a Chief Data Protection Officer and team responsible for addressing such grievances. To raise a concern, Users may contact us at Email ID- dpo@pandharpurmerchants.bank.in and Contact: 9730359311. We may need to verify your identity before responding to your request, and we will endeavour to resolve your grievance promptly.

6. Privacy awareness/practice

The Bank provides mandatory privacy training for all employees, supported by periodic privacy and security awareness communications to reinforce best practices.

The bank also conducts periodic privacy analysis [PIAs (Privacy Impact Assessments) and DPIAs (Data Protection Impact Assessments)] of all processes/products.

The bank has also created a mechanism for notifying of privacy breaches.

In the event of a privacy breach, the bank would conduct a root cause analysis and take appropriate remedial measures.

7. Use of Access Log Files

logs IP addresses, browser type, number of pages viewed, etc., to provide better service for our users. We use the information to obtain page view statistics, analyse trends, better understand site usage, and support system administration. The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur digital platforms may use cookies, device identifiers, and similar technologies to enhance customer experience. And by accessing the website, the Users consent to such data being obtained and processed by the Bank.

8. Use of User Information

The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur may use the Customer Information for the purposes, inter alia, customer identification/ verification, providing of financial services and products, for customisation of products or services, marketing or promotion of financial products/ services; to check credit rating, enforcement of Customer obligations and such other purpose to facilitate optimal and high-quality services.

The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur reserves the right to perform statistical analysis of user behaviours and preferences to measure users' relative interests in the various areas of the website for product and service development. The analysis is anonymous and not tagged to identifiable users. The analytical data that The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur collects is for internal use only to improve the content and services of its website. In return, users will benefit from improved service quality.

9. Disclosure to Third Parties

Unless The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur specifically informs users at the time of collection, or unless users give express consent, The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur does not provide any personally identifying information to a third party (except under certain circumstances indicated below). However, if permitted or required by law or subpoenaed or ordered by a court of law or to enforce the Terms and Conditions of the Products or services or to safeguard/defend our rights, interests and properties or that of our affiliates, The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur will have to disclose to the proper authorities the personal information of any individual user.

The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur may disclose data generated after statistical analysis (not tagged to identifiable users) to any person without limitation, and the User hereby consents to such disclosure. The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur may disclose Customer Information to any of The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur associates and affiliates, without limitation, and the User/Client hereby give consent for the same.

We may disclose the Customer Information to third parties for purposes including, inter alia, advertising, joint product promotion campaigns, availing support services, participation in an electronic clearing network, etc. The Bank ensures that any disclosure of personal data to third parties is governed by principles of ethical responsibility, transparency, and accountability, with safeguards to protect individual privacy.

We may also share with third parties, the information obtained with your consent, from your mobile device like device location, device information (including storage, model, installed apps, Wi-Fi, mobile network etc.), transactional and promotional SMS, communication and call logs, for purposes including statistical analysis, credit rating etc. to enable us to provide you banking / financial services with high quality and standards. However, when disclosing any such information to third parties as afore-mentioned, we will make reasonable efforts to bind them to keep it secure and confidential, and to use it for the purpose for which it is disclosed. You hereby give your consent for the same.

10. Links to Other Materials

Linked sites are not under the control of The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur, and The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur will not be held responsible for the content or privacy policies of any linked sites or for any links to other linked sites.

11. Use of SMS for Registration/Activation of Mobile Apps/Online Channels

The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur uses an SMS/OTP-based procedure for the activation of its official mobile applications & online platforms for security & system administration purposes. We do not publicly disclose any personal or sensitive user data related to financial or payment activities or any government identification numbers to any third party, except in accordance with the terms of this privacy policy.

12. Security

The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur is committed to safeguarding customer data and to ensuring the transparent, lawful, and secure handling of all personal and financial information. We adhere strictly to all applicable legal and regulatory requirements relating to data protection, including those prescribed by the Reserve Bank of India. We ensure that clear internal policy guidelines are in place for the collection, storage, use, retention, sharing, and destruction of customer data. Only such data as is necessary for the performance of the services offered or as required under applicable law is collected and retained. The nature and purpose of data collected are clearly disclosed to customers at the time of collection, and data is processed solely for the specified and legitimate purposes for which consent has been obtained.

Concerning data storage and retention, The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur follows the standards outlined in our Preservation of Records Policy, which details the types of data that may be stored, the permissible retention periods, periodic review mechanisms, and secure archival processes. A copy of this policy is available here. The security policies of The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur are

formulated in accordance with applicable laws, regulatory guidelines, and industry standards. The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur has implemented robust security measures to protect customer data against unauthorised access, loss, misuse, alteration, or disclosure. These include, but are not limited to:

- Role-based access control and strong user authentication protocols.
- Data encryption in transit and at rest.
- Network segmentation and firewalls to protect system boundaries.
- Regular vulnerability assessments and penetration testing of critical systems.
- Employee confidentiality agreements and periodic security training.
- Comprehensive incident management and breach notification procedures, including reporting to relevant authorities in accordance with applicable laws.
- Prompt corrective and remedial actions to mitigate the impact of any breach, prevent recurrence, and ensure continued data integrity and compliance.

13.Data Retention

We will keep the data we collect from customer on our systems or with third parties for as long as required for the purposes set out in this Policy or even beyond the expiry of transactional or account based relationship with customer: (a) as required to comply with any applicable legal and regulatory obligations, or (b) for establishment, exercise or defence of legal claims, or (c) as specified in this Privacy Policy, or (d) in accordance with specific consents obtained from customer.

14.Policy Review and Enforcement

This policy will be reviewed, as and when it deems fit, and may be changed, altered, or modified by the IT and Legal departments and the Board of Directors to ensure alignment with evolving cyber security regulations. Violations of this policy may result in disciplinary action, up to and including termination of employment. Customers are advised to monitor changes in the policy, as the policy will be binding upon them in relation to their use of The Pandharpur Merchants Co-Operative Bank Ltd. Pandharpur services.

This policy is approved by the Board of Directors of THE PANDHARPUR MERCHANTS CO-OPERATIVE BANK LTD PANDHARPUR in BOD meeting held on Date: - 30/04/26 by Resolution No: - 17.