

# PRIVACY POLICY

Spocto Solutions Private Limited

*A Yubi Company*



<b>Effective Date</b>	March 2026
<b>Version</b>	2.0
<b>Last Reviewed</b>	March 2026
<b>Data Fiduciary</b>	Spocto Solutions Private Limited — Spocto
<b>Contact</b>	compliance@spocto.com   +91 22 2088 6445
<b>Website</b>	<a href="https://www.spocto.com">https://www.spocto.com</a>

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## 1. Introduction

We, Spocto Solutions Private Limited (“SSPL”), hereinafter referred to as “Spocto”, are a private limited company incorporated under the provisions of the Companies Act, 2013, and a member of the Yubi Group (CredAvenue Private Limited). Spocto is engaged in providing AI-enabled technology solutions for debt collections and credit recovery, offered through our proprietary platform, Spocto X. Our services include AI-driven borrower segmentation and engagement, omnichannel outreach (SMS, WhatsApp, Email, Voice, Video, and Call Centre), compliance monitoring, field operations management, and skip trace services, delivered as a B2B SaaS solution to banks, non-banking financial companies (NBFCs), asset reconstruction companies (ARCs), and other financial institutions.

This Privacy Policy explains how we collect, use, store, share, and protect your personal data when you visit our website (<https://www.spocto.com>), use our platform, APIs, or any other services we offer (collectively, the “Services”).

This Policy is issued in compliance with:

- The Digital Personal Data Protection Act, 2023 (“DPDP Act”) and the Digital Personal Data Protection Rules, 2025 (“DPDP Rules”);
- The Information Technology Act, 2000 and the IT (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
- The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021;
- Guidelines on Digital Lending issued by the Reserve Bank of India (RBI), 2022; and
- All other applicable laws, regulations, and guidelines issued by applicable regulatory authorities, including the RBI.

By using our Services, you acknowledge that you have read and understood this Policy. This Policy should be read in conjunction with our Terms of Use. Where applicable, supplemental privacy notices may be provided to you at the time of specific interactions.

## 2. Key Definitions (as per DPDP Act, 2023)

The following terms carry the meanings assigned under the DPDP Act, 2023:

- Data Principal: The individual to whom personal data relates (i.e., you).
- Data Fiduciary: Spocto, as the entity that determines the purpose and means of processing your personal data.
- Data Processor: Any third party that processes personal data on behalf of Spocto under a valid contract.
- Personal Data: Any data about an individual that can identify that individual directly or indirectly.
- Processing: Collection, recording, organisation, structuring, storage, adaptation, retrieval, use, disclosure, erasure, or destruction of personal data.
- Consent Manager: A Board-registered entity through which a Data Principal may manage, review, or withdraw consent.
- Data Protection Board (DPB): The adjudicatory body established under the DPDP Act.
- Sensitive Personal Data (SPD): Financial data, health data, biometric data, and other categories as may be notified, which warrant heightened protection.

### 3. Identity and Contact Details of the Data Fiduciary

<b>Legal Entity</b>	Spocto Solutions Private Limited (CIN: U72200MH2016PTC280481)
<b>Brand Name</b>	Spocto (also marketed as Spocto X)
<b>Group</b>	Yubi (CredAvenue Private Limited)
<b>Registered Office</b>	Unit 603 & 604, 6th Floor, B&C Wing, Reliable Tech Park, Thane–Belapur Road, Gavate Wadi, MIDC, Airoli, Navi Mumbai, Maharashtra – 400708, India
<b>Website</b>	<a href="https://www.spocto.com">https://www.spocto.com</a>
<b>Privacy / Compliance</b>	compliance@spocto.com   +91 22 2088 6445
<b>Grievance Redressal</b>	grievance.redressal@spocto.com

#### 3.1 Applicability of this Policy

This Policy applies to all Personal Data we collect through our Systems and/or in the course of your use of our Services. Our Systems may contain links to third-party websites. This Policy does not apply to personal data collected by those third-party sites, which are governed by their respective privacy policies. We encourage you to review those policies whenever you access an external site through our platform.

### 4. Personal Data We Collect

We collect only the personal data that is necessary for the specified purposes for which consent has been obtained or for legitimate uses as defined under the DPDP Act. The categories of personal data we collect include:

#### 4.1 Data Provided Directly by You

- Identity data: Full name, designation, organisation name
- Contact data: Email address, phone number, mailing address
- Account credentials: Username and password for platform access
- Communication data: Messages, emails, or queries sent to us
- Official identifiers (where required for KYC or regulatory compliance): PAN, Aadhaar number, GST number, Driving Licence, Passport Number, Voter ID, company registration details

#### 4.2 Data Collected Through Our Services (on Behalf of Clients)

In the course of delivering our B2B debt collection and recovery services to our clients (financial institutions), we may process personal data relating to their borrowers/customers (Data Principals) as a Data Processor. Such data may include:

- Financial data: Loan account details, outstanding amounts, repayment histories, bank account numbers, credit bureau scores, and GST filing information
- Contact and demographic data: Name, address, phone number, email address, date of birth
- Communication data: Call recordings, WhatsApp messages, SMS logs, and email correspondence generated through the Spocto X platform

- Geolocation data: Where field agent visits are involved and the Data Principal has consented

Processing of such borrower data is governed by Data Processing Agreements (DPAs) between Spocto and its clients, and Spocto acts as a Data Processor in respect of such data.

### 4.3 Data Collected Automatically

- Technical data: IP address, browser type, device identifiers, operating system
- Usage data: Pages visited, features accessed, time spent, click data
- Cookie data: Session cookies, analytics cookies, preference cookies (see Section 9)

### 4.4 Data from Third-Party Sources

- Publicly available government databases: Ministry of Corporate Affairs (MCA), GSTN, credit bureaus, NSDL, and other authorised government data repositories
- Data licensed from authorised data providers (subject to applicable law and contractual restrictions)
- Payment gateway providers: Repayment status and transaction verification data

## 5. Purpose of Processing and Legal Basis

In accordance with Section 6 of the DPDP Act, we process personal data only for lawful purposes — either based on your free, specific, informed, and unambiguous consent, or for a “legitimate use” as permitted under Section 7 of the DPDP Act.

Purpose of Processing	Data Categories Used	Legal Basis (DPDP Act)
Platform access & account management	Identity, contact, credential data	Consent (§6)
Delivering debt collection / recovery services	Financial, credit, borrower-contact data	Consent (§6) / Contractual necessity
Responding to enquiries, demos, support	Contact, communication data	Consent (§6)
Analytics & product improvement	Usage, technical data (aggregated / anonymised)	Legitimate Use (§7)
Fraud prevention & security monitoring	Technical, identity, transaction data	Legitimate Use (§7)
Legal & regulatory compliance	As required by applicable law	Legal Obligation (§7)
Marketing & communications (opt-in only)	Contact data	Consent (§6)
Cookie-based analytics	Cookie, usage data	Consent (per DPDP Rules)
Compliance monitoring & reporting to clients	Agent interaction, call recordings (where applicable)	Contractual / Legitimate Use (§7)

## 5.1 Change of Purpose

We collect and process personal data solely for the specific purposes outlined in this Policy. If we need to use personal data for a new purpose not originally agreed upon, we will first obtain your fresh, explicit consent for that new purpose.

## 6. Consent

In accordance with Section 6 of the DPDP Act, we ensure that consent for processing personal data is:

- Free, specific, informed, and unambiguous;
- Obtained through a clear affirmative action (no pre-ticked boxes or bundled consents);
- Presented in clear and plain language in English or any Eighth Schedule language upon request; and
- Accompanied by the contact details of our Compliance / Privacy Team.

You have the right to withdraw your consent at any time by contacting us at [compliance@spocto.com](mailto:compliance@spocto.com). Upon withdrawal, we will cease processing within a reasonable time, unless continued processing is required or authorised under applicable law. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal.

Where we process personal data of children (individuals below 18 years of age), we will obtain verifiable parental consent and will not engage in behavioural monitoring or targeted advertising directed at children.

## 7. Sharing of Personal Data

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

### 7.1 With Data Processors

We may engage third-party service providers (Data Processors) who process data on our behalf, including cloud infrastructure providers, analytics vendors, communication platform providers, and IT service partners. All processors are contractually bound (via NDAs and DPAs) to process data only as instructed by Spocto, in accordance with the DPDP Act, and to implement equivalent security standards as required under Section 8(2) of the DPDP Act.

### 7.2 With Clients (Lenders, Banks, NBFCs, ARCs)

As part of our B2B service delivery, borrower-related data processed through the Spocto X platform is shared with the relevant client (financial institution) that engaged Spocto for its collection services. Such sharing is governed by Data Processing Agreements between Spocto and its clients. Spocto does not use client borrower data for its own commercial purposes beyond service delivery.

### 7.3 Within the Yubi Group

Personal data may be shared with other entities within the Yubi Group for group-level compliance, risk management, IT infrastructure support, or regulatory reporting purposes, subject to applicable data protection obligations.

### 7.4 With Regulatory and Government Bodies

We may disclose personal data to law enforcement agencies, regulators (including the Data Protection Board of India, the Reserve Bank of India, and other applicable authorities), or courts where required by law, court order, or to comply with legal obligations.

### 7.5 In Business Transfers

In the event of a merger, acquisition, restructuring, or sale of business assets involving Spocto or the Yubi Group, personal data may be transferred to the successor entity, subject to the same privacy obligations. We will provide notice before your personal data is transferred and becomes subject to a different privacy policy.

### 7.6 Cross-Border Transfers

As of the effective date of this Policy, personal data may be transferred to service providers or group entities located outside India for cloud hosting or IT support purposes. Such transfers are conducted subject to applicable law and the terms of our processor agreements. We will comply with any restrictions on cross-border data transfers notified by the Central Government under Section 16 of the DPDP Act.

## 8. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, or as required by applicable law. Our general retention principles are:

- Account and contact data: Retained for the duration of your relationship with us, plus a period necessary for legal compliance (generally up to 8 years from the end of the engagement, in accordance with applicable Indian laws).
- Borrower data processed on behalf of clients: Retained in accordance with client DPAs; identifiable data is deleted or returned to the client upon conclusion of the service engagement, unless longer retention is legally required.
- Usage and technical data: Retained in aggregate or anonymised form for analytics; identifiable data deleted after 12 months.
- Consent records: Retained for a period sufficient to demonstrate compliance with the DPDP Act (not less than 3 years from the date of collection or processing, whichever is later).
- Communication and call recordings: Retained for up to 12 months or as required by client agreements or regulatory mandates.

Upon the expiry of the retention period, personal data will be securely erased or anonymised using industry-standard methods. Where erasure is requested by you under your right to erasure, we will act within the timelines set out in the DPDP Rules, unless retention is legally required. Please note that if you request deletion of personal data before the requirement to process it ends, Spocto shall not be liable for any consequential damages arising from such early deletion.

## 9. Cookies and Tracking Technologies

Our website uses cookies and similar technologies. We categorise these as follows:

- Essential Cookies: Strictly necessary for the website to function. No consent is required for these cookies.
- Analytics Cookies: Help us understand how visitors use our website (e.g., Google Analytics). These are placed only with your consent.

- **Functionality Cookies:** Remember your preferences and personalise your experience. Placed with your consent.
- **Advertising / Targeting Cookies:** Used to track visitors for personalised communications. Placed only with your explicit consent.

You can manage your cookie preferences at any time through our Cookie Preference Centre on the website. Withdrawing consent for non-essential cookies will not affect your ability to use the core website.

## 10. Data Security

Spocto is ISO 27001 certified and implements appropriate technical and organisational security measures to protect personal data against unauthorised access, loss, alteration, disclosure, or destruction. Our security framework includes:

- SSL/TLS encryption for all data in transit
- Encryption of sensitive data at rest
- Role-based access control (RBAC) and comprehensive audit logging
- Regular security assessments, penetration testing, and vulnerability management
- Employee training on data protection, information security, and responsible data handling
- Incident Response Plan (IRP) for managing and reporting security incidents
- Non-Disclosure Agreements (NDAs) and Data Processing Agreements (DPAs) with all third-party vendors

In the event of a personal data breach that is likely to result in harm to you, we will notify the Data Protection Board of India and affected Data Principals in the manner and within the timelines prescribed under Section 8(6) of the DPDP Act and the DPDP Rules. Any individual who suspects that a breach or exposure of protected data has occurred must immediately contact us at [compliance@spocto.com](mailto:compliance@spocto.com).

Please note that while Spocto strives to use commercially reasonable means to protect your personal data, no method of transmission over the Internet or method of electronic storage is 100% secure.

## 11. Your Rights as a Data Principal

The DPDP Act, 2023 grants you the following rights with respect to your personal data processed by Spocto. You may exercise these rights by contacting us at [compliance@spocto.com](mailto:compliance@spocto.com).

Your Right	What It Means
<b>Right to Information (§11)</b>	Obtain a summary of personal data we hold, purposes of processing, and identities of processors and third parties to whom data has been disclosed.
<b>Right to Correction (§12)</b>	Request correction of inaccurate, incomplete, or outdated personal data held by us.

<b>Right to Erasure (§12)</b>	Request erasure of personal data no longer necessary for the purpose it was collected, unless retention is required by law.
<b>Right to Grievance Redressal (§13)</b>	A readily available means of redressing grievances in relation to any act or omission of Spocto regarding your data.
<b>Right to Nominate (§14)</b>	Nominate another individual to exercise your data rights in the event of your death or incapacity.
<b>Right to Withdraw Consent (§6(4))</b>	Withdraw consent at any time. Withdrawal does not affect lawfulness of processing prior to withdrawal.
<b>Right to Complain to DPB (§13(2))</b>	If your grievance is not resolved, file a complaint with the Data Protection Board of India at <a href="http://www.dpdpboard.gov.in">www.dpdpboard.gov.in</a> .

Please note: We may be unable to fulfil action requests where erasure or correction conflicts with legal obligations, regulatory requirements, or legitimate interests. We will inform you of any such limitations within a reasonable time of receiving your request.

## 12. Grievance Redressal Mechanism

If you have any concern, complaint, or grievance regarding the processing of your personal data, you may contact our designated Compliance / Privacy Team:

<b>Privacy / Grievance Contact</b>	Spocto Solutions Private Limited — Compliance Team
<b>Primary Email</b>	<a href="mailto:compliance@spocto.com">compliance@spocto.com</a>
<b>Grievance Email</b>	<a href="mailto:grievance.redressal@spocto.com">grievance.redressal@spocto.com</a>
<b>Phone</b>	+91 22 2088 6445 / +91 22 6901 8101
<b>Response Timeline</b>	Acknowledgement on receipt; resolution within 30 days unless extended circumstances apply.
<b>Escalation</b>	Data Protection Board of India at <a href="http://www.dpdpboard.gov.in">www.dpdpboard.gov.in</a> (once operational).

The Company will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Privacy Policy. If unresolved, you may escalate the matter to the Data Protection Board of India (once operational) at [www.dpdpboard.gov.in](http://www.dpdpboard.gov.in) or to such regulatory authority as may have jurisdiction.

## 13. Automated Processing and AI-Driven Decision-Making

Spocto’s platform (Spocto X) leverages artificial intelligence and machine learning models for borrower segmentation, engagement strategy optimisation, compliance monitoring, and risk scoring. Where such automated processing may produce decisions that significantly affect you as a borrower (e.g., prioritisation of collection efforts, channel selection), this is done on behalf of our client financial institutions who remain the Data Fiduciary for such processing.

You have the right to seek human review of any automated decision that significantly affects your interests. Requests for human review should be directed to the relevant financial institution (our client) or to us at [compliance@spocto.com](mailto:compliance@spocto.com), and we will facilitate appropriate escalation.

## 14. Processing of Children’s Personal Data

Our Services are intended for adult users and enterprise clients. We do not knowingly collect personal data from individuals below the age of 18 years without verifiable parental consent. If we become aware that personal data of a child has been collected without appropriate consent, we will promptly delete such data.

In accordance with Section 9 of the DPDP Act, we do not engage in behavioural monitoring or targeted advertising directed at children.

## 15. Third-Party Websites and Services

Our website and platform may contain links to third-party websites, including data sources such as MCA, GSTN, and credit bureau portals. This Privacy Policy does not apply to such third-party websites. We encourage you to review the privacy policies of any third-party services you access through our platform. Spocto is not responsible for the privacy practices of such third parties.

## 16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, applicable law, or regulatory requirements. This Policy shall be reviewed at least annually. When we make material changes, we will:

- Post the updated Policy on our website (<https://www.spocto.com>) with a revised effective date;
- Where required by law, seek fresh consent for any new processing activities; and
- Notify registered platform users via email or in-platform notification, where practicable.

Your continued use of our Services after the posting of changes will constitute your acknowledgement of the updated Policy. We recommend reviewing this Policy periodically.

## 17. Governing Law and Jurisdiction

This Privacy Policy is governed by and construed in accordance with the laws of India, including the Digital Personal Data Protection Act, 2023, the Information Technology Act, 2000 (as applicable), and all applicable rules, regulations, and guidelines thereunder. Any dispute arising out of or in connection with this Policy shall be subject to the exclusive jurisdiction of the courts of India and the Data Protection Board of India, as appropriate.

## 18. Contact Us

For any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal data, please reach out to:

<b>Organisation</b>	Spocto Solutions Private Limited (Spocto), a Yubi Company
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<b>Registered Address</b>	Unit 603 & 604, 6th Floor, B&C Wing, Reliable Tech Park, Thane–Belapur Road, Gavate Wadi, MIDC, Airoli, Navi Mumbai, Maharashtra – 400708, India
<b>Privacy / Compliance Email</b>	compliance@spocto.com
<b>Grievance Email</b>	grievance.redressal@spocto.com
<b>Phone</b>	+91 22 2088 6445 / +91 22 6901 8101
<b>Website</b>	https://www.spocto.com

## 19. Annexure Nomination Under S. 14 DPDP Act.

### PART A: NOMINATOR DETAILS (Data Principal)

<b>Full Name:</b>	_____
<b>Father's/Mother's Name:</b>	_____
<b>Date of Birth:</b>	____ / ____ / _____
<b>Gender:</b>	_____
<b>Residential Address:</b>	_____ _____ PIN: _____
<b>Email:</b>	_____
<b>Phone:</b>	_____
<b>Aadhaar Number:</b>	____ _ (last 4 digits)

<b>PAN/Passport:</b>	_____
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**PART B: NOMINEE DETAILS**

<b>Full Name:</b>	_____
<b>Father's/Mother's Name:</b>	_____
<b>Date of Birth:</b>	____ / ____ / _____
<b>Relationship to Nominator:</b>	_____
<b>Residential Address:</b>	_____ _____ PIN: _____
<b>Email:</b>	_____
<b>Phone:</b>	_____
<b>Aadhaar Number:</b>	____ _ (last 4 digits)
<b>PAN/Passport:</b>	_____

**PART C: NOMINATION DECLARATION**

I, **[Nominator Name]**, being of sound mind and under no undue influence, hereby nominate **[Nominee Name]** to exercise all my rights under the Digital Personal Data Protection Act, 2023, in the event of my death or incapacity.

**The nominee shall have the authority to:**

- Request access to my personal data from any Data Fiduciary (Section 11)
- Request correction, completion, or updating of my personal data (Section 12)
- Request erasure of my personal data (Section 12)
- Withdraw any consents I have given for data processing
- File grievances with Data Fiduciaries on my behalf (Section 13)
- File complaints with the Data Protection Board of India on my behalf (Section 13)
- Exercise any other rights available to me under the DPDPA 2023

**Scope of Nomination:**

- All Data Fiduciaries (universal nomination)
- Specific Data Fiduciaries only (list attached)

**Special Instructions (Optional):**

[Example: "Please delete all my social media accounts." / "Please preserve and share family photos with my children." / "Please ensure my financial data is accessible for estate settlement."]

**Revocation Rights:** I reserve the right to revoke, modify, or replace this nomination at any time by submitting a fresh nomination in writing to the concerned Data Fiduciaries.

**Date:** \_\_\_\_ / \_\_\_\_ / \_\_\_\_

**Place:** \_\_\_\_\_

**Signature of Nominator:**

\_\_\_\_\_  
[Nominator Name]

**PART D: NOMINEE'S ACCEPTANCE**

I, **[Nominee Name]**, hereby accept the nomination made by **[Nominator Name]** and agree to exercise the data rights on their behalf in the event of their death or incapacity. I understand that I must act in the best interests of the nominator and will handle their personal data with utmost care and confidentiality.

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Place: \_\_\_\_\_

**Signature of Nominee:**

\_\_\_\_\_  
[Nominee Name]

**PART E: WITNESSES (OPTIONAL BUT RECOMMENDED)**

**Witness 1:**

<b>Name:</b>	_____
<b>Address:</b>	_____
<b>Signature:</b>	_____
<b>Date:</b>	____ / ____ / ____

**Witness 2:**

<b>Name:</b>	_____
<b>Address:</b>	_____
<b>Signature:</b>	_____
<b>Date:</b>	____ / ____ / ____

 **IMPORTANT NOTES:**

1. This nomination is valid only for rights under DPDPA 2023. For financial assets, separate nominations are required.

2. Keep this document in a safe place and inform your family members of its location.
3. Provide a copy to your nominee and keep a digital backup.
4. Submit copies to all relevant Data Fiduciaries (email, social media, cloud storage, etc.).
5. Review and update this nomination every 3-5 years or whenever circumstances change.
6. In case of multiple nominations (old and new), the latest dated nomination will prevail.

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*This Privacy Policy is effective as of March 2026 and has been reviewed in March 2026.*  
**Spocto Solutions Private Limited | A Yubi Company | AI-Enabled Debt Collection**