Privacy Policy for Commonwealth Inclusive Growth Services Ltd. (CIGS) Mobile App

Introduction & Scope

This Privacy Policy outlines the practices of Commonwealth Inclusive Growth Services Ltd. ("CIGS," "we," "us," "our") regarding the collection, use, storage, disclosure, and protection of personal information collected through our Mobile App ("App"). By accessing or using the App, you agree to the terms described in this Policy.

This Policy complies with Rule 4(1) of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and Google Play's data privacy requirements.

Data Collected & Source

CIGS may collect the following categories of data from users (Field Supervisors, Area Managers, and related personnel) through the App:

- **Personal Information:** Name, mobile number, employee/agent code, designation.
- **Location Data:** GPS coordinates, addresses visited (if geo-tagging or location tracking is enabled for field visits).
- **Device Information:** Device identifiers, operating system, and related technical details.
- **Usage Data:** App usage statistics, login activity, time and frequency of data submissions.
- **Field Data:** Information collected during field visits as required by CIGS, banks, or regulators. This may include photos, documents, or other collected evidence.
- **Communications Data:** In-app messages, support queries submitted to the helpdesk.

Purpose of Data Collection

The information collected is used for:

- Authenticating users and enabling secure access to App features.
- Capturing and verifying field activity for compliance and monitoring.
- Coordinating with banks and technology service providers for service delivery.
- Managing workflows, task assignments, and supervision.
- Resolving technical or operational queries through the helpdesk.
- Fulfilling regulatory and legal obligations.
- Improving App performance, troubleshooting, analytics, and feature enhancements.

Data Sharing & Disclosure

CIGS may share data with:

- **Partner Banks:** For service fulfillment, compliance, and reporting.
- **Technology Service Providers:** For provision and maintenance of App infrastructure.

- **Regulatory Authorities:** As required under applicable law.
- **Internal Personnel:** Such as Area Managers, Field Supervisors, and the Helpdesk, on a need-to-know basis.
- **Third Parties:** Only with express consent, or as mandated by law.

CIGS does not sell or rent user data to third parties for marketing purposes.

User Rights & Choices

You have the right to:

- Access, update, or correct your personal information.
- Request deletion or restriction of your data, subject to legal and operational requirements.
- Withdraw consent, where processing is based on consent.
- Contact the Helpdesk for privacy-related queries or to exercise your rights.

Security Measures

CIGS applies reasonable safeguards to protect your data, including:

- Encryption of sensitive information in transit and at rest.
- Access controls and user authentication.
- Regular reviews and audits of security practices.
- Secure storage and restricted internal access.

Data Retention

Data is retained only as long as necessary to fulfill the purposes outlined above and as required under applicable laws or contractual obligations with banks. After this period, information will be securely deleted or anonymized.

Children's Privacy

This App is intended solely for use by authorized adult personnel (e.g., Field Supervisors and Area Managers). It is not directed at children under 18 years of age. If you believe a minor has provided personal data, please contact us for prompt removal.

Policy Updates

CIGS may update this Privacy Policy from time to time to reflect changes in legal, regulatory, or operational requirements. The latest version will be available within the App and on our website. Continued use of the App after such updates signifies your acceptance.

Contact Information

For questions or concerns related to this Privacy Policy or your personal data, please contact:

CIGS Privacy Compliance Team
Email: ranganathan.p@cigs.in

Address: Commonwealth Inclusive Growth Services Ltd., No.27, Dr. Ambedkar Road, Kodambakkam, Chennai – 600 024
Helpdesk: 044 – 2488 8100 & 2372 0161

This Policy is effective as of 13th August 2025 and is subject to change without prior notice, except as required by law.