



THE PRATAP CO-OPERATIVE BANK
LTD.

REVIEW OF PRIVACY POLICY

2025-2026

PRIVACY POLICY

THE PRATAP CO OPERATIVE BANK LTD

(Applicable to Website, Digital Channels, and Electronic Banking Services)

1. PREAMBLE

This Privacy Policy ("Policy") is issued by The Pratap Co-Op. Bank Ltd. ("Bank", "we", "us", or "our") in accordance with:

- Directions, guidelines, and advisories issued by the Reserve Bank of India ("RBI");
- The Digital Personal Data Protection Act, 2023 and rules framed thereunder;
- The Information Technology Act, 2000 and allied rules;
- The Banking Regulation Act, 1949;
- The Prevention of Money Laundering Act, 2002 (PMLA); and
- Other applicable Indian laws, regulatory frameworks, and banking standards.

This Policy governs the collection, use, storage, disclosure, protection, and processing of personal data of customers and users accessing the Bank's website, mobile applications, internet banking platforms, and other digital or electronic interfaces.

2. OBJECTIVE AND SCOPE

2.1 Objective

The objective of this Privacy Policy is to:

- protect the confidentiality and privacy of personal information of customers and users;
- promote transparency in the collection, use, and handling of personal information;
- ensure compliance with applicable laws, regulations, and directives issued by the Reserve Bank of India and other statutory authorities; and
- safeguard customer interests by preventing unauthorised access, misuse, loss, or disclosure of personal information.

2.2 Applicability

This Policy shall apply to:

- all customers, visitors, and users accessing or using the Bank's website, mobile applications, and other digital or electronic platforms;
 - all personal information collected or processed by the Bank through online forms, applications, portals, digital interactions, or electronic means; and
 - all employees, officers, agents, service providers, and vendors who handle or process personal information on behalf of the Bank.
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3. DEFINITIONS

For the purpose of this Policy:

- “Personal Data” means any data about an individual who is identifiable, including name, address, contact details, identification documents, account details, transaction data, or digital identifiers.
- “Sensitive Personal Data” includes financial information, authentication credentials, biometric data, Aadhaar, PAN, and transaction history.
- “Processing” includes collection, storage, use, transmission, disclosure, or deletion of Personal Data.
- “Customer” means any individual or entity maintaining an account or availing services from the Bank.

4. PRINCIPLES GOVERNING DATA PROCESSING

The Bank processes personal information in accordance with applicable laws, regulatory requirements, and sound banking practices. In this regard, the Bank follows the following principles:

- Lawful and Fair Processing: Personal information is collected and processed only for lawful banking purposes and in a fair and transparent manner.
- Purpose Limitation: Personal information is collected for specified, explicit, and legitimate purposes and is not processed in a manner incompatible with such purposes.
- Data Minimisation: The Bank limits the collection of personal information to what is necessary for the provision of banking products and services.
- Accuracy: Reasonable efforts are made to ensure that personal information is accurate, complete, and kept up to date.
- Storage Limitation: Personal information is retained only for such period as is required to meet legal, regulatory, or operational requirements.
- Security and Confidentiality: Appropriate technical and organisational measures are implemented to safeguard personal information against unauthorised access, disclosure, alteration, or destruction.

5. INFORMATION COLLECTED

5.1 Information Provided by Customers

- The Bank may collect personal information provided by customers or users in the course of availing banking products or services, including but not limited to:
- name, address, date of birth, and other identity details;
- contact information such as mobile number, email address, and residential address;

- Know Your Customer (KYC) and identification documents, including PAN, Aadhaar, passport, or such other documents as may be prescribed under applicable laws;
- account details, transaction information, and service-related data; and

5.2 Automatically Collected Information

- When customers or users access the Bank's website or digital platforms, certain information may be collected automatically, including:
 - internet protocol (IP) address, browser type, device information, and operating system;
 - website usage data, cookies, and similar tracking technologies; and
 - system logs and audit trails generated for security, monitoring, and regulatory purposes.

6. PURPOSE OF COLLECTION AND USE

The Bank collects and processes personal information for lawful banking and related purposes, including but not limited to:

- opening, operating, and maintaining customer accounts and relationships;
- processing financial and non-financial transactions and service requests;
- compliance with Know Your Customer (KYC), Anti-Money Laundering (AML), and other regulatory requirements;
- credit appraisal, risk assessment, monitoring, and prevention or detection of fraud;
- providing internet banking, mobile banking, Unified Payments Interface (UPI), and other digital or electronic banking services;
- communicating with customers regarding accounts, transactions, products, services, alerts, and service-related updates; and
- internal audit, compliance, risk management, and statutory or regulatory reporting.

7. LEGAL BASIS FOR PROCESSING

The Bank processes personal information in accordance with applicable laws and regulatory guidelines. Such processing may be undertaken on the basis of one or more of the following:

- with the consent of the customer, wherever such consent is required under applicable laws;
- as necessary for the performance of contractual obligations or for providing banking products and services to the customer;
- for compliance with legal and regulatory obligations, including those prescribed by the Reserve Bank of India and other statutory authorities; and
- for the legitimate interests of the Bank, such as ensuring security of systems, prevention and detection of fraud, and effective risk management, to the extent permitted under applicable laws.

8. DATA SHARING AND DISCLOSURE

The Bank does not sell, rent, or commercially exploit customers' personal information.

The Bank may disclose or share personal information only in the following circumstances:

- where such disclosure is required under applicable laws, regulations, court orders, or directions issued by statutory or regulatory authorities, including the Reserve Bank of India;
- with credit information companies, payment systems, clearing houses, or other financial institutions, as permitted under law and customary banking practice;
- with service providers, agents, or vendors engaged by the Bank for the purpose of providing services, strictly on a need-to-know basis and subject to appropriate confidentiality obligations;
- for purposes such as verification, credit assessment, risk management, fraud prevention, and compliance with regulatory requirements; and
- with the consent of the customer, wherever such consent is required under applicable laws.

All such sharing or disclosure of personal information is undertaken in accordance with applicable laws and RBI guidelines on customer confidentiality.

9. DATA SECURITY MEASURES

The Bank has implemented reasonable and appropriate physical, technical, and administrative security measures in accordance with applicable laws and regulatory guidelines, including those issued by the Reserve Bank of India, to protect personal information against unauthorised access, alteration, disclosure, or destruction.

Such measures include, inter alia, secure systems and infrastructure, encryption of data during transmission, controlled access to information on a need-to-know basis, and periodic monitoring and review of security controls. The Bank also undertakes periodic cyber security assessments and audits as may be required under regulatory guidelines.

Customers are advised to maintain strict confidentiality of their login credentials, passwords, and other authentication details and shall be responsible for all activities carried out using such credentials.

10. DATA RETENTION AND DELETION

The Bank shall retain personal information only for such period as is necessary to fulfil the purpose for which it was collected and as required under applicable laws, regulations, and regulatory guidelines, including those issued by the Reserve Bank of India, the Prevention of Money Laundering Act, 2002, the Income-tax Act, 1961, and other applicable statutes.

Upon expiry of the applicable retention period, such personal information shall be securely deleted, destroyed, or anonymised, in accordance with the Bank's internal policies and applicable legal and regulatory requirements.

11. CUSTOMER RIGHTS

Subject to applicable laws, rules, and regulatory guidelines, customers may:

- request access to their personal information held by the Bank;
 - seek correction or updation of inaccurate or incomplete personal information;
 - withdraw consent for processing of personal information, where such processing is based on consent and permitted by law;
 - request deletion or anonymisation of personal information which is no longer required to be retained under applicable laws or regulatory requirements; and
 - lodge complaints or grievances in relation to unauthorised use, disclosure, or breach of personal information.
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12. COOKIES AND WEBSITE USAGE

The Bank uses cookies to:

- Enhance user experience;
- Improve security;
- Analyse website traffic.

Users may manage cookie preferences through browser settings.

13. DISCLAIMER REGARDING WEBSITE CONTENT

All information, notifications, circulars, and materials ("Content") on the website are provided for general information purposes.

The Bank does not warrant absolute accuracy or completeness and reserves the right to modify content at any time without notice. Use of such content is at the user's own risk.

No part of the website content may be reproduced or distributed without prior written permission of the Bank.

14. GRIEVANCE REDRESSAL MECHANISM

Customers may contact the designated Grievance Redressal Officer for any privacy-related concerns. If unresolved, customers may approach the RBI under the Integrated Ombudsman Scheme.

15. POLICY REVIEW AND AMENDMENT

This Policy shall be reviewed periodically to ensure compliance with changes in law, RBI guidelines, and technological advancements.

The Bank reserves the right to amend this Policy at its sole discretion.

The policy has been reviewed and approved in the Board Meeting dated 20/12/2025.



Chairman



Chief Executive Officer