

PRIVACY AND CONFIDENTIALITY POLICY

1. Purpose and Commitment

CFC Finlease Private Limited (“CFC” or “the Company”) is committed to protecting the privacy and confidentiality of all information entrusted to us. This Policy sets out the framework for the collection, use, storage, sharing, and protection of information in the course of our ESG rating and advisory activities. It ensures compliance with applicable laws, regulations, and the highest ethical standards in data handling.

2. Scope

This Policy applies to:

- All information provided by clients, rated entities, investors, regulators, and other stakeholders.
- All employees, consultants, and representatives of CFC handling such information.
- All digital and physical data managed by CFC, including proprietary methodologies, rating outcomes, and internal assessments.

3. Principles of Privacy and Confidentiality

CFC adheres to the following principles:

1. **Lawful Use** – Information will only be collected and processed for legitimate business purposes, in compliance with applicable laws and SEBI guidelines.
2. **Purpose Limitation** – Data will be used strictly for the purpose for which it was provided, unless otherwise required by law.
3. **Access Control** – Only authorized personnel shall have access to confidential data on a need-to-know basis.
4. **Data Integrity and Security** – Appropriate technical and organizational measures will be implemented to prevent unauthorized access, alteration, or disclosure of data.
5. **Retention** – Information will be retained only for as long as necessary for business or regulatory purposes.

4. Confidential Information

Confidential information includes, but is not limited to:

- Non-public financial, operational, or ESG-related data of rated entities.
- Proprietary methodologies, models, and analytical frameworks.
- Business strategies, client lists, contracts, and reports.
- Employee and stakeholder personal data.

Such information shall not be disclosed to third parties without prior consent, except where disclosure is required by law, regulation, or regulatory authorities.

5. Permitted Disclosures

While confidentiality is paramount, the following disclosures are permissible under controlled conditions:

- **Regulatory Compliance** – Information may be shared with SEBI or other competent authorities as required by law.
- **Peer Comparison & Benchmarking Services** – ESG rating outcomes (but not sensitive non-public data) may be shared with subscribers of peer comparison or benchmarking subscription plans, in line with agreed terms and conditions.
- **Third-Party Service Providers** – Vendors or partners engaged by CFC may be granted limited access to information strictly for business operations, under confidentiality agreements.

6. Rights of Stakeholders

- Clients and stakeholders may request access to their information, seek corrections, or raise concerns regarding data handling.
- CFC will respond to such requests in a timely and transparent manner, in accordance with applicable laws and regulatory requirements.

7. Responsibilities of Employees

- Employees are required to maintain strict confidentiality of all information accessed during their duties.
- No employee shall disclose, misuse, or exploit confidential information for personal or professional gain.
- Any breach of confidentiality obligations will invite disciplinary action, up to termination and legal recourse.

8. Review and Updates

This Policy shall be reviewed periodically by the Board of Directors to ensure continued compliance with regulatory requirements and industry best practices. Updates or modifications will be published on the Company's website.

Declaration

By engaging with CFC Finlease Private Limited, all stakeholders acknowledge and consent to the terms outlined in this Privacy and Confidentiality Policy.
