DATA RETENTION POLICY: Anytime Finconsult LLP

1. Objective

To ensure that personal and financial data of applicants is retained only as long as necessary to fulfill the "Specified Purpose" (Loan Sourcing & Servicing) and to comply with the DPDPA 2023 and RBI/PMLA guidelines.

2. Retention Schedule

We categorize data into three stages to maximize agent utility while staying legal:

Category	**Retention Period**	**Legal Justification**
Leads (Non-Converted)	1 Year from last contact	To handle follow-ups and avoid duplicate sourcing.
Rejected Applications	2 Years post-rejection	Necessary for audit trails and to explain "Reason for Rejection" to regulators.
Active Loans	Full Tenure of Loan + 2 Years	Required for loan servicing, top-up eligibility, and assisting lenders in recovery/audits.
Statutory Records	5 to 8 Years	Mandated by **PMLA (Prevention of Money Laundering)** and Companies Act.

3. "Legitimate Interest" Clause

Anytime Finconsult LLP shall retain the **"Minimum Necessary Data"** (Name, Contact, Loan Account Number, and Consent Logs) even after loan closure for a period of 5 years to:

- Defend against legal claims or consumer disputes.
- Facilitate "Referral Fee" reconciliation with Banks/NBFCs.
- Comply with tax and GST audit requirements.

4. Data Deletion Protocol

Upon expiry of the retention period or a valid "Request for Erasure" (where no loan is active):

- **Digital Files:** Securely deleted from primary servers and cloud backups.
- **Physical Files:** Shredded using a cross-cut shredder.
- **Anonymization:** Data may be "Anonymized" (removing names/numbers) for internal sales analytics and performance tracking.

5. Storage Security

- All data is stored on **India-based secure servers**.
- Access is restricted to authorized employees on a "Need-to-Know" basis.
- Use of unauthorized removable media (USB drives) for data transfer is strictly prohibited.

[Signature] **Designated Partne**

For **Anytime Finconsult LLP**