

## **Privacy Policy**

This Privacy policy is applicable to Senbonzakura Consultancy Private Limited (referred to as “Company” or “Gyandhan”).

We are committed to protect your personal data and respect your privacy. Privacy Policy provides the practices and policies applicable to Company for handling of or dealing in Personal Information, including Sensitive Personal Data or Information (as defined below) that is lawfully collected by Company. Please read the terms of the Policy carefully to understand our practices regarding your personal data and how we will treat it. This Policy sets out the basis on which any personal data we collect from you, we collect about you, or that you provide to us, will be processed by us.

This Privacy Policy is published in compliance with, inter alia:

- a. Section 43A of the Information Technology Act, 2000 (“IT Act”);
- b. Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (“SPDI Rules”); and
- c. Regulation 3(1) of the Information Technology (Intermediaries Guidelines and Digital Media Ethics Code) Rules, 2021 (“Intermediaries Guidelines”).

### **DEFINITIONS**

- i. Reference to “you” or “your” in this Privacy Policy refers to any natural person (including the employees of the Company) who provides to the Company any information referred in Schedule 1 of this document or any user(s) of Gyandhan’s website or business applications whether or not, you avail the Services offered by the Company.
- ii. “Act” shall mean the Information Technology Act, 2000 and Rules thereunder as amended from time to time.
- iii. “Information” shall mean and include Personal Information and Sensitive Personal Data or Information as may be collected by the Company.
- iv. “Personal Information (PI)” shall have the same meaning as under Rule 2 (i) of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time. For ease of reference Rule 2 (i) of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 is re-produced under *Schedule 1*.
- v. “Rules” shall mean the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time.
- vi. “Registered User” shall mean such user whose registration is accepted by the Company and who accesses Company’s web portal/business applications based on the password based authentication chosen.
- vii. “Sensitive Personal Data or Information (SPDI)” shall mean and include information under Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 as amended from time to time. For ease of reference Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 is re-produced under *Schedule 1*.
- viii. “Services” for the purpose of this Privacy Policy shall mean:-
  - a. the services of the Company which has been sought by any person either by way of registration on Company’s website or any other mode/platform of the Company or any other means (electronic or otherwise)
  - b. any engagement/arrangement of the Company with any person, wherein the Company

has sought services and for the limited purpose of this Policy shall include services from suppliers, consultants, vendors etc. as the case may be. All words and expressions used and not defined in this document but defined in the Act or the Rules shall have the meanings respectively assigned to them in the Act or the Rules.

- ix. “website” shall mean [www.gyandhan.com](http://www.gyandhan.com).
- x. ‘We’, ‘Us’ & ‘Our’ shall mean the Website and/or the Company,

This Privacy policy sets out the practices adopted in respect of Information, including the types of Information that is collected, the mode/method of collection of Information, usage of Information, sharing and retention of Information, etc.

This Privacy Policy is published in compliance with the provisions of the Act and the Rules made thereunder that require publishing the privacy policy on Company’s website. ***Gyandhan urges you to read this Privacy Policy carefully before you use or opt to access any services of the Company or decide to part with any Personal Information including the information listed under Schedule 1. If You do not agree with any of the terms and conditions of this Privacy Policy, please do not proceed further to use this Site or the App or any Services. This Privacy Policy is subject to change at any time without notice. To make sure You are aware of any changes, please review this policy on this Site or the App periodically.***

By accessing or using the Platform or the Service, or by otherwise giving Us Your information, You confirm that You have the capacity to enter into a legally binding contract under Indian law, in particular, the Indian Contract Act, 1872, and have read, understood and agreed to the practices and policies outlined in this Privacy Policy and agree to be bound by the Privacy Policy. You hereby consent to Our collection, use, sharing, and disclosure of Your information as described in this Privacy Policy. We reserve the right to change, modify, add or delete portions of the terms of this Privacy Policy, at Our sole discretion, at any time, and any continued use of the App, the Services or the Platform, following any such amendments to the Privacy Policy, will be deemed as an implicit acceptance of the Privacy Policy in its amended form. You are requested to review the Privacy Policy from time to time to keep yourself updated with any changes; modifications made to the terms hereof.

If You are accessing or using Services on the App or the Site from an overseas location, You do so at Your own risk, and shall be solely liable for compliance with any applicable local laws.

## **1. Collection of Information**

We may collect PI/SPDI about you from a variety of sources, including through:

- i. Online and electronic interactions with us, including via the website, mobile applications, text messaging programs or through our pages on third party social networks.
- ii. Your interaction with online targeted content (such as advertisements) that we or service providers on our behalf provide to you via third party websites and/or applications.
  - a. By providing us with consent to process your personal data, you acknowledge that we will collect, store, use, and disclose your PI/SPDI in accordance with this Policy. This

includes:

- **Identity and profile-related data:** First and last names, parents' names, dates of birth, gender, photographs, location, educational qualifications, purpose of loans, house ownership, employment status, company names, contact information, and marital status.
  - **KYC data:** Identification documents issued by government authorities, such as Aadhaar, PAN card, and voter ID.
  - **Transaction data:** Details of transactions that occur through the products and services or in connection with the services, including sought or availed services.
  - **Data from SMS:** SMS data from individuals' phones is collected to verify and analyse financial positions, cash flow, credits, income, and spending patterns, with individuals' permission.
  - **Financial data:** Past credit history, income details, details of loans, payments, bank account information, and bank account statements.
  - **Device data:** IP addresses, browser types, time zone settings, operating systems, and device information.
  - Account login information including any information that is required for you to establish a user account with us. (e.g. login ID/email, user name, password and security question/answer).
  - PI/SPDI collected by the Company from its employees, suppliers or onsite consultants for the purpose of employment, availing their services and recording their attendance etc.
  - PI/SPDI received by Company from any person seeking career opportunities or provided by its employees through background verification or security checks.
  - Information collected by Company in respect of Disaster recovery plan, crisis management, internal and external communications.
  - For any other purposes as Company may deem necessary.
- b. Data is not collected from individuals' mobile phone resources, such as contact lists, call logs, telephony functions, and files and media.

We do not collect your biometric data. However, we may take one-time access of your camera, microphone, location (fine and coarse GPS data), or any other facility solely for the purpose of onboarding or KYC checks, after obtaining your explicit consent.

- c. The Company is required to collect your personal data to provide you with access to the Products and Services. In certain cases, we are required to collect personal data as required by law, or under the Terms. If you fail to provide us that data as and when requested by us, we will not be able to perform our obligations under the arrangement we have with you or are trying to enter into with you (for example, to provide you with features of the Services). In this case, we may have to cancel or limit your access to the Services (or part thereof).

d. Collection Of Financial SMS Information

We don't collect, read or store your personal SMS from your inbox. We collect and monitor only financial SMS sent by 6-digit alphanumeric senders from your inbox which helps us in identifying the cash flow patterns, description and amount of the transactions undertaken by you as a user to help us perform a credit risk assessment which enables us to determine your risk profile and to provide you with the appropriate credit analysis. This process will enable you to take financial facilities from the regulated financial entities available on the platform. This Financial decision will be

based on historical transaction data too.

**e. Collection Of Device Location and Device Information**

We collect and monitor the information about the location of your device to provide serviceability of your loan application, to reduce risk associated with your loan application and to provide pre- approved customized loan offers. This also helps us to verify the address, make a better credit risk decision and expedite know your customer (KYC) process. Information the App collects, and its usage, depends on how you manage your privacy controls on your device. When you install the App, we store the information we collect with unique identifiers tied to the device you are using. We collect information from the device when you download and install the App and explicitly seek permissions from You to get the required information from the device. The information we collect from your device includes the hardware model, build model, RAM, storage; unique device identifiers like IMEI, serial number, SSAID; SIM information that includes network operator, roaming state, MNC and MCC codes, WIFI information that includes MAC address and mobile network information to uniquely identify the devices and ensure that no unauthorized device acts on your behalf to prevent frauds.

**2. Credit and Investment Products and Services**

We will collect your personal information, such as proof of identity, address, contact details, bank account details, demat account details, credit information, and risk profiles, from applicants, customers, and users of its website and mobile applications. This information will be used for evaluating credit applications, credit risk assessments, investment applications, providing products and services, complying with customer identification requirements under the law, and maintaining and reporting customer account information as required by applicable laws.

**3. Social Media**

Information made publicly available on social media and third-party sources may be collected by us. You can control your browser privacy settings for information shared on social media through your system cookies and settings. Additionally, we may receive information from credit bureaus, registries, account aggregators, and other regulated entities.

**4. Related Persons**

Information about related persons, co-applicants, guarantors, nominees, ultimate beneficial owners, and others may be collected to comply with applicable laws or to evaluate credit and risk profiles, provided the necessary consents and permissions are obtained.

**5. Payment Processing**

Payment-related information, such as credit card, debit card, and bank account details, may be collected when making payments on Gyandhan's website or mobile applications. It is saved to facilitate payment processing through third-party payment gateways, subject to their terms, conditions, and privacy policies.

## **6. Log File Information**

Log file information is automatically reported when accessing the program and may also be collected from emails sent to users. This data helps track email interactions, application usage, and provides insights for reporting and optimization.

## **7. Method of Collecting Information**

We will use following methods to collect and process your personal data, including:

### **a. Information Provided by You**

Information voluntarily provided by users when using the Services or corresponding with us, such as during registration, feature use, data sharing, or issue reporting. Records of these interactions are maintained.

### **b. Information Collected from Your Devices**

Information is automatically collected when users visit the use the Products or Services through tools like cookies and mobile application.

### **c. Information Received from Third Parties**

Personal data is obtained from third parties, public sources, and data analytics tools. This data contributes to reporting, marketing, and improving user experience.

In case the information provided by the user or customer is invalid or not accessible, e.g., a change in contact details, Gyandhan may reach out to an appropriate and authorized bureau and agency to obtain the updated information.

### **d. Publicly Available Information**

We will not have control over personal data made publicly available, such as reviews or comments in public sections of the platform or application stores. Provider of the information or users share such data at their own risk, and we will not be responsible for third-party misuse of this information.

### **e. Information Received from Specialized Service Providers**

We also obtain your information from third party entities that your business maintains accounts with, such as financial institutions, service providers referral partners, identity verification services, card networks, vendors, mailing list providers, consumer reporting agencies, commercial credit bureaus and associations, fraud prevention agencies. We may combine this information with the information that has already been collected from you or about you.

For example, we may obtain transactional information about your businesses from financial institutions, information about your business' engagement with customers from social networking services, and information about your business' sales volume from service providers.

## **8. Purpose for which Information is Collected (How we use your data)**

- i. We use personal data in accordance with applicable laws, primarily to provide services and comply with legal obligations.
- ii. Employees, suppliers or consultants of the Company shall be duly advised about the purpose for which any Information is being collected at the time of such collection
- iii. By using our services, you authorize us to contact us via email, phone, or other means

- to ensure awareness of service features.
- iv. We use your personal data for the following purposes and activities undertaken without direct human supervision or control:
- To register you as a user;
  - To provide you with the Services;
  - To facilitate your application to avail loan and otherwise in connection with your obtaining of credit facilities from regulated entities including our lending partners
  - To manage our relationship with you, including notifying you of changes to any Services;
  - To administer and protect our business and the products or services, including troubleshooting, data analysis, system testing, and performing internal operations;
  - To deliver content to you;
  - To send you communication, including through WhatsApp business messages, in relation to your use of the Products or Services;
  - To monitor trends so we can improve the Products and Services;
  - To improve our business and delivery models;
  - To perform our obligations that arise out of the arrangement we are about to enter or have entered with you;
  - To enforce our Terms;
  - To undertake marketing services, including sending you promotional messages;
  - To make offers of relevant products and promotions time to time;
  - To obtain services related feedback;
  - To perform data analysis pertaining to our business, while using anonymized or masked data;
  - To respond to court orders, establish or exercise our legal rights, or defend ourselves against legal claims;
  - In compliance with the Reserve Bank of India's norms, to contact you or locate you in case of any default; and
  - To ensure compliance with applicable laws.

## **9. Storage, sharing & disclosure of collected information**

### **i. Storage & sharing of Information**

- a. **Your Consent:** You allow us to collect, compile, and share their information with third parties, including Lenders and service providers, solely for rendering Services. Failure to provide consent may hinder our ability to meet its obligations.
- b. **Communication Authorization:** You authorize us, our partners, and affiliates to contact them via email or phone to ensure you are aware of Service features.
- c. **Legal Compliance:** We will share data when required by law, courts, government agencies, or authorities.
- d. Your data, including financial data, will be stored on systems located in India.

### **ii. Disclosure of Personal Information**

- a. **Third Parties:-**The Company may engage third party service providers to perform functions and provide services to us, such as hosting and maintaining our servers, websites and mobile applications management, conducting surveys or contests, third-party solutions for marketing and analytics, application developers, database storage and management, data hosting, e-mail management, payments processing, some aspects of our technical and customer support, collections and recovery. In order to enable these third parties to perform these services for us and for you we may share

your personal information, and possibly some non-personal information, with them on a 'need to know' basis after imposing confidentiality obligations on them.

Further, We do not disclose PI/SPDI to third parties without your consent, except when necessary for normal financial business operations or legally permitted. The third party receiving the sensitive personal data or information from the Company or any person on its behalf shall not disclose it further.

- b. **Legal proceedings:-**In the event, the Company is required to respond to subpoenas, court orders or other legal process, and such other Government agencies as mandated under the law to obtain information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences, your PI/SPDI may be disclosed pursuant to such subpoena, court order or legal process, request which may be without notice to you.
- c. **Sharing upon merger or amalgamation or intra-group transfer:** Any third party to which We transfer or sell Our assets, merge or consolidate with, will have the right to continue to use the information (including SPDI) provided to Us by You, in accordance with the Terms and this Privacy Policy. We may disclose information to Our partners, affiliates, subsidiaries, group entities, investors, stakeholders or potential associates in an anonymized and aggregate manner, so that they too may understand how Users use Our Site and enable Us to create a better overall experience for You; and
- d. **Improving Our business:** You acknowledge that We have a right to use a recorded copy of Your telephonic conversation for improving Our Services, marketing and promotional efforts, customize Your experience. These uses improve the Site, and the Services, and better tailor it to meet Your needs, so as to provide You with an efficient, safe and customized experience. We may transfer such PI/SPDI to a third party, including persons outside India, to improve product and Service offerings while taking commercially reasonable steps to try and ensure, that the recipient adheres to the applicable laws for ensuring data protection as is adhered by Us.
- e. **Transfer to third parties and outside India:**Subject to applicable law, We may at Our sole discretion, transfer PI/SPDI to any other body corporate (as defined under the Information Technology Act, 2000) that ensures at least the same level of data protection as is provided by Us under the terms hereof, located in India or any other country.

By using the Site, You accept the terms hereof and hereby consent to Us, sharing with and/or processing of Your personal information and SPDI by third parties, including in any location outside India, provided that they ensure that Your SPDI is protected in compliance with standards that are comparable to the standards of protection afforded to it in India or equivalent international standards.

## 10. Links to Other Websites

Our website and mobile applications may contain links to other websites and mobile applications that are not operated by us. If you click on a third-party link, you will be directed to that third party's site or mobile application. We advise you to review the privacy policy and terms of use of every site you visit and every mobile application that you use. Third parties are under no obligation to comply with this Privacy Statement with respect to

personal data that you provide directly to those third parties or that those third parties collect for themselves. We do not control the third-party websites or mobile applications that may be accessible through our websites or mobile applications. Thus, this Privacy Policy does not apply to information you provide to third-party websites or mobile applications or gathered by the third parties that operate them. Please be aware that we have no control over the content and policies of those websites or mobile applications and we cannot accept responsibility or liability for their respective privacy practices.

Gyandhan encourages you to review the privacy policies and terms of other websites, services and mobile applications accessed through our platform.

## **11. Protection of Personal Information**

The Company takes precautions to protect the security of your personal information. Such security practices and procedures as stipulated under applicable law will be applied on the personal information, We collect from you. Stringent security measures (physical, electronic and managerial) are in place to protect against the loss, misuse, and alteration of the PI/SPDI under our control. Gyandhan's servers are accessible only to authorized personnel and your information is shared with employees and authorized personnel strictly on a 'need to know' basis. To protect the privacy of your personal information, we implement a variety of security measures to maintain the safety of your personal information. Please be aware that we cannot rule out breach of privacy of your personal information on account of breach of any of our physical, technical, or managerial safeguards.

As a technology driven financial market infrastructure, the Company uses and has a comprehensive documented information security program and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with the Information being protected. The Company periodically assesses, audits and updates its information security protocols and policies to achieve the highest standards on a continuous and ongoing basis

Where we receive your personal information through the digital lending applications of our loan service providers, we require them to have privacy policies to govern the personal information they collect from you. Collection of your personal information through our digital lending applications will be need-based and with your prior and explicit consent and the purpose of obtaining consent will be disclosed at each stage of interface. Your explicit consent will be taken before sharing your personal information with any third party, except for cases where such sharing is required as per applicable law.

The PI/SPDI provided to the Company shall be accurate, not misleading, updated and complete. The details shall be updated as and when such PI/SPDI provided earlier becomes incorrect or out of date, by providing new details. You may review the Information you have provided to the Company at any time. On your request, the Company will ensure that any PI/SPDI notified to be inaccurate or deficient, shall be corrected or amended. However, the Company shall not be responsible for the authenticity of the PI/ SPDI provided directly or to such body corporate or any other person acting on behalf of such body corporate.

Notwithstanding anything contained in this Privacy Policy or elsewhere, Gyandhan shall not be held responsible for any loss, damage or misuse of your PI/SPDI, if such loss, damage or misuse is attributable to a Force Majeure Event.

Third parties that are service providers to the Company with whom personal information



will be shared by the Company will be required to provide access to such personal information to its personnel only on a need-to-know basis.

## **12. Data Protection or Grievance Redressal**

You can contact the Data Protection Officer or Grievance Redressal Officer in case of any privacy concern, complaint, or any question regarding this Privacy Policy

Title: Grievance Redressal Officer

Email ID: [compliances\\_legal@gyandhan.com](mailto:compliances_legal@gyandhan.com)

**Mobile:** +91-9266731966

- a. We facilitate your request to exercise these rights, following regulations governing data processing and storage. To initiate this process, they should send an email to the Data Protection Officer or Grievance Officer, as detailed in Section 14 of this Policy, providing a comprehensive outline of the right(s) they intend to exercise. Additionally, you describe the personal data they believe we hold. In case further information is necessary, the Grievance Officer will get in touch with them.
- b. Our privacy team will aim to respond to these requests within 15 days. If, for any reason, they cannot meet this timeline, you will be duly informed.

## **13. Support**

Users of our services, website or mobile application will send an email to **[contact@gyandhan.com](mailto:contact@gyandhan.com)**, in case of any questions or to require any support regarding this Privacy Policy.

## **14. Data Retention and Destruction Protocols**

- Any deletion or destruction of any personal data governed by this Privacy Policy in terms thereof shall be, to the extent technically possible and in accordance with the relevant industry standards. Alternatively, we may render the personal data into anonymized data, so that it no longer constitutes personal data.
- We ensure that users acknowledge personal data, and it may continue to be stored as required or permitted by laws, regulations, or for legal defense.
- We ensure that KYC, device location, and SMS data shall be deleted or anonymized as per applicable legal or regulatory requirements pertaining to data retention from the application date. Other data will be deleted or anonymized upon your request, provided there are no active loans or services. However, legal obligations or applicable laws may prevent data deletion in some cases.

### **Rectification and Erasure of Personal Information**

- If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please write to [contact@gyandhan.com](mailto:contact@gyandhan.com) (e-mail id) with the subject line “Rectification Request”. We will take reasonable steps to correct any personal information found to be inaccurate, incomplete, misleading, or out of date. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion.

- If you require any personal information of yours in our possession to be deleted wholly or partially, you may write to [contact@gyandhan.com](mailto:contact@gyandhan.com) (e-mail id) with the subject line “Erasure Request”. We will consider deleting such personal information subject to our obligations under applicable laws, our rights and obligations under contracts, and our legitimate interests including for the establishment, exercise or defense of legal claims if such personal information is no longer necessary for the purpose for which it was originally collected or processed for.
- You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your information may exist in a non-erasable form that will be difficult or impossible for us to locate. Personal information that has been deleted pursuant to any request for deletion will not be retrieved for use thereafter.
- Gyandhan shall verify the accuracy of any newly provided personal. When using Company’s services, website, or mobile application; individuals will be provided with the means to review and correct inaccurate or incomplete information, as permitted by legal requirements.

## 15. Notification of data breaches

Gyandhan complies with applicable laws applicable to the organization in respect of any data breach.

## 16. Legal Rights

Under certain circumstances, you have the right to:

- **Request the erasure of your personal data:** This enables you to ask us to delete or remove personal data. We shall comply with any request, subject to applicable laws and the terms of the loans that are sanctioned through the mobile application.
- **Right to Deny Consent:** You can opt not to grant consent for the processing of your personal data. However, this choice may affect our ability to provide services.
- **Right to Revoke Consent:** You can withdraw consent at any time. We comply with any such request, subject to applicable laws and the terms governing Products or Services.

## 17. Children’s Privacy

Gyandhan service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

## 18. Cookies

Cookies, small data files stored on the device, help us distinguish you from other users and to remember your preferences. This enhances the experience and allows us to improve services.

- a. Cookies identify you without accessing personal data like email addresses. Data collected via cookies helps us manage and personalize services, granting access to certain features.
- b. Third parties may place cookies on specific pages; we don’t control their cookie usage.
- c. We use cookies to enhance your experience. You can configure the browser to refuse

or alert about cookies, but this may affect website functionality.

## **19. Website Disclaimer**

We use cookies to give you the best possible experience with gyandhan.com. Some are essential for this site to function; others help us understand how you use the site, so we can improve it. We may also use cookies for targeting purposes. Click “Accept all cookies” to proceed as specified or click “Manage my preferences” to choose the types of cookies you will accept.

## **20. Changes to this policy**

- a. We may, at our discretion, make changes to this Privacy Policy to reflect updates in our business processes, upgrades in privacy standards and procedures, or legislative or regulatory changes. You acknowledge that any such policy changes will be effective from the date of posting on our website, and notification of these changes will be published on the website.
- b. We keep our Policy under regular review and may amend it from time to time, at our sole discretion.
- c. The terms of this Policy may change and if it does, these changes will be posted on this page and, where appropriate, notified to you by email or phone number through SMS.

By providing Gyandhan with PI/SPDI, a provider of the information acknowledges that the Company will collect, store, use, process, disclose and share providers personal information in accordance with the applicable laws and this Privacy Policy.

## **Schedule 1**

Rule 2 (i) “Personal information” means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

Rule 3 Sensitive personal data or information of a person means such personal information which consists of information relating to: -

- (i) password;
- (ii) financial information such as Bank account or credit card or debit card or

- other payment instrument details;
- (iii) physical, physiological and mental health condition;
- (iv) sexual orientation;
- (v) medical records and history;
- (vi) Biometric information;
- (vii) any detail relating to the above clauses as provided to body corporate for providing service; and
- (viii) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise;

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.