

To,  
Live and Live-enabled FIPs, and AAs

### **Subject: Revision of Consent Validity Limits for Lending Use Cases**

This is to inform that the Fair Use Templates for certain lending-related use cases have been revised, following deliberations in the Lending Council and the Fair Use Committee.

Previously, the Fair Use Templates for these use cases had the consent validity upper bound marked as “Co-terminous” with the loan tenure. This made the effective consent duration open-ended and variable. It also made it difficult for AAs and FIPs to enforce Fair Use checks uniformly. In the absence of a set upper limit, any disproportionately high consent validity values went unchecked, raising concerns around customer data protection.

To address this, the following upper limits have now been defined:

- **CT003 – Loan Monitoring Template**: Up to **5 years**, or the **loan tenure**, whichever is lower
- **CT035 – Loan Collection Template**: Up to **8 years**, or the **loan tenure**, whichever is lower — applicable **only in defaulter cases**

#### **Rationale for the Revision as agreed by the users:**

- Brings clarity and enforceability to Fair Use implementation by AAs and FIPs
- Sufficient upper bound for the length of the period as is practically needed to monitor a customer's account, even in case of loans with a tenure of more than the recommended consent validity caps.
- Acknowledges the business need for extended access in default recovery scenarios
- Ensures risk containment and alignment with data minimisation principles
- Enables more consistent and predictable implementation of consent rules across the ecosystem

As with all templates, this revision will be subject to review in the coming months based on ecosystem feedback and technical developments, and may be further updated if required.

All participating entities in the AA ecosystem are requested to implement this revision to maintain alignment with Fair Use guidelines.

In case you have any questions, please write to [fairuse@sahamati.org.in](mailto:fairuse@sahamati.org.in).



Regards,  
Sahamati Fair Use Team

PS: Please note that the revision will be updated in the Fair Use Implementation Rules for AAs on the Github in the next release.