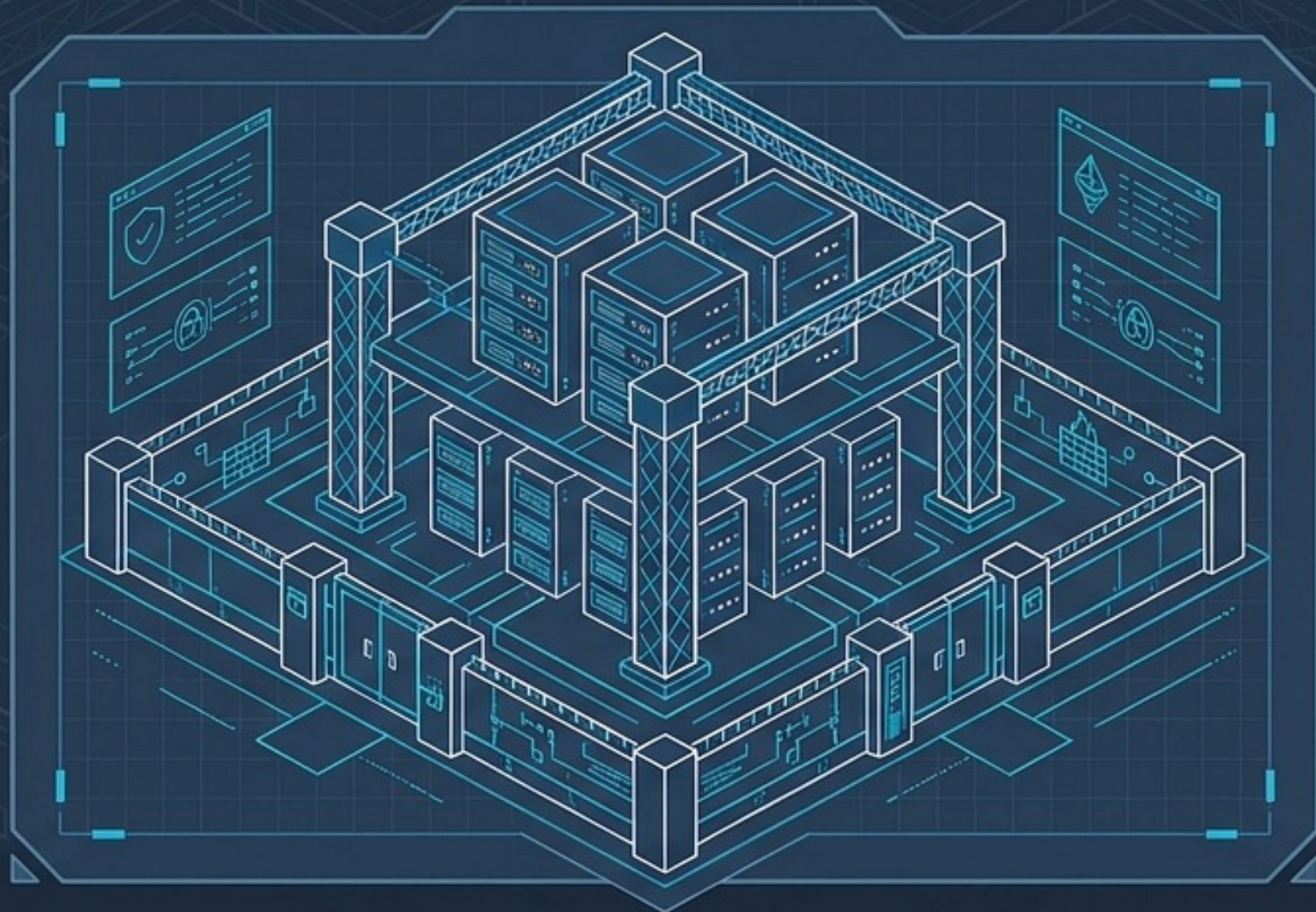


Strategic Framework &  
Technical Evaluation



# The P2P Licensing Blueprint

Translating RBI Regulatory Mandates into Actionable IT Architecture

Cyberyog P2P Licensing Consultation



# The Non-Negotiable Boundaries of NBFC-P2P

The RBI strictly defines P2P platforms as intermediaries. Operating outside these boundaries risks immediate license rejection or cancellation.

## The Platform Role

- Intermediary ONLY.
- No balance sheet lending.
- No credit guarantees.
- No acting as a deposit taker.

## Financial Caps

- Aggregate exposure across all P2P platforms is capped at ₹50,00,000 per lender.
- Single lender to single borrower exposure cannot exceed ₹50,000.

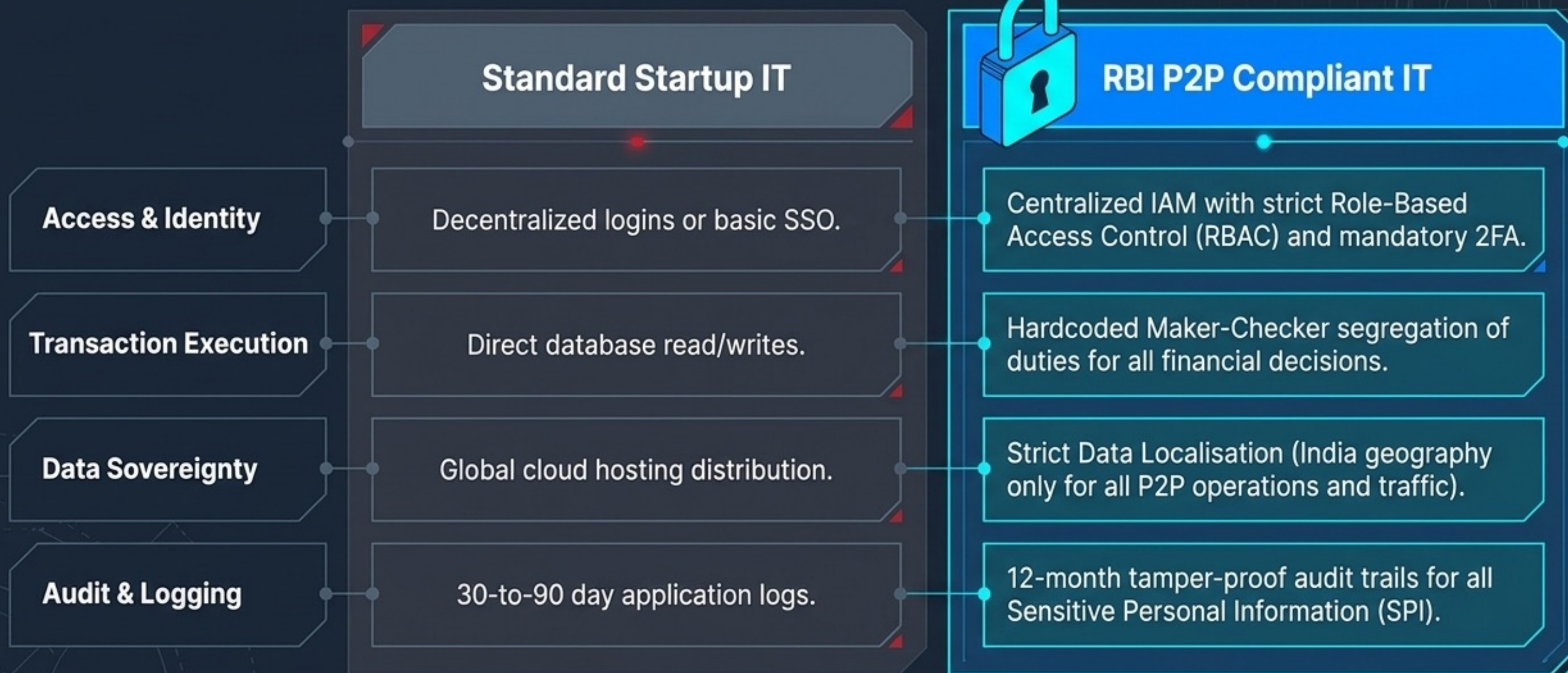
## Prudential Norms

- The platform must maintain a Leverage Ratio not exceeding 2.
- Maximum loan maturity is 36 months.

## Permitted Activities

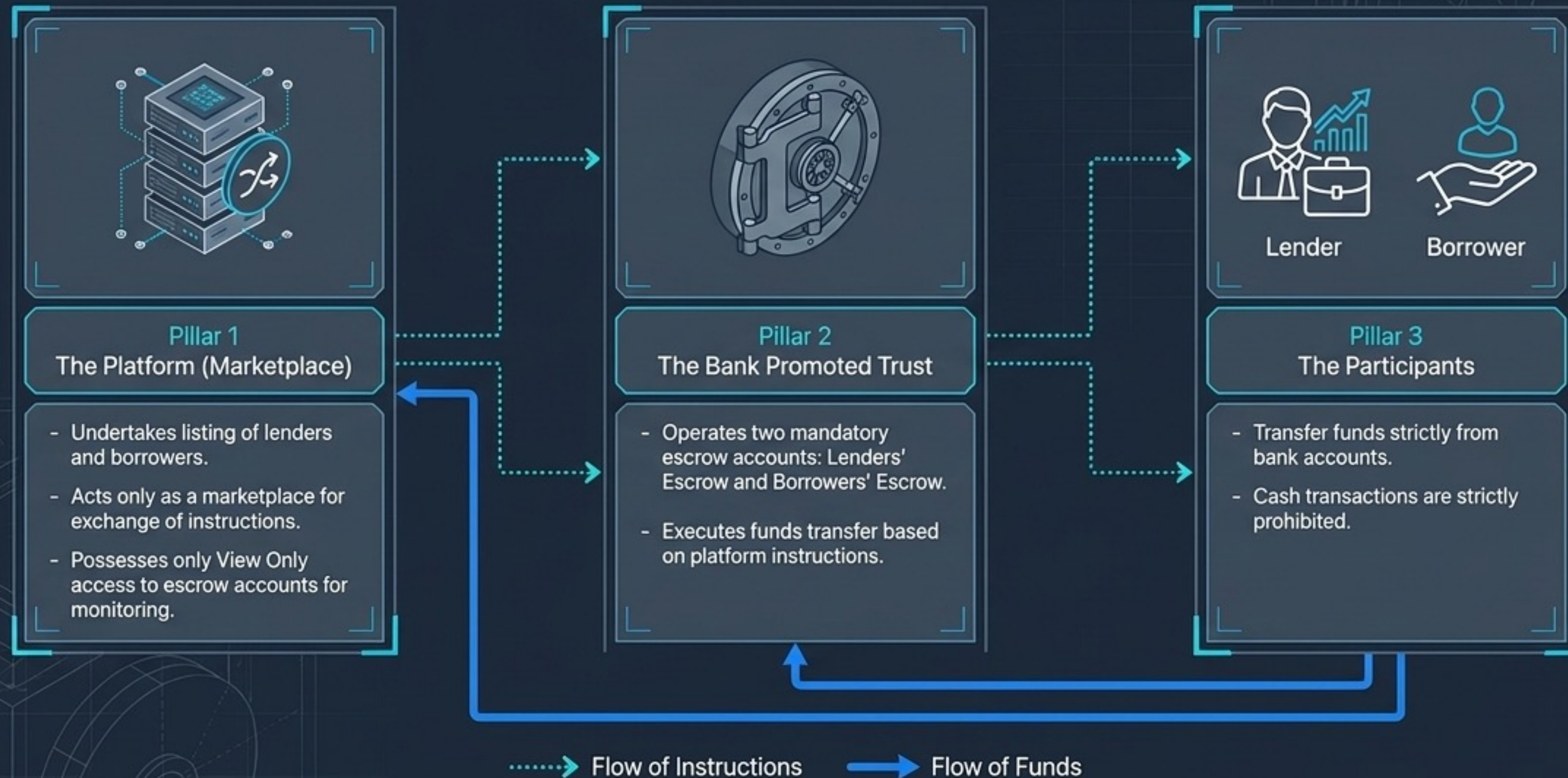
- Clean, unsecured lending only.
- Cross-selling is prohibited (except for loan-specific insurance).

# Standard Tech Stacks Fail RBI Compliance



# The Tri-Party Escrow Engine

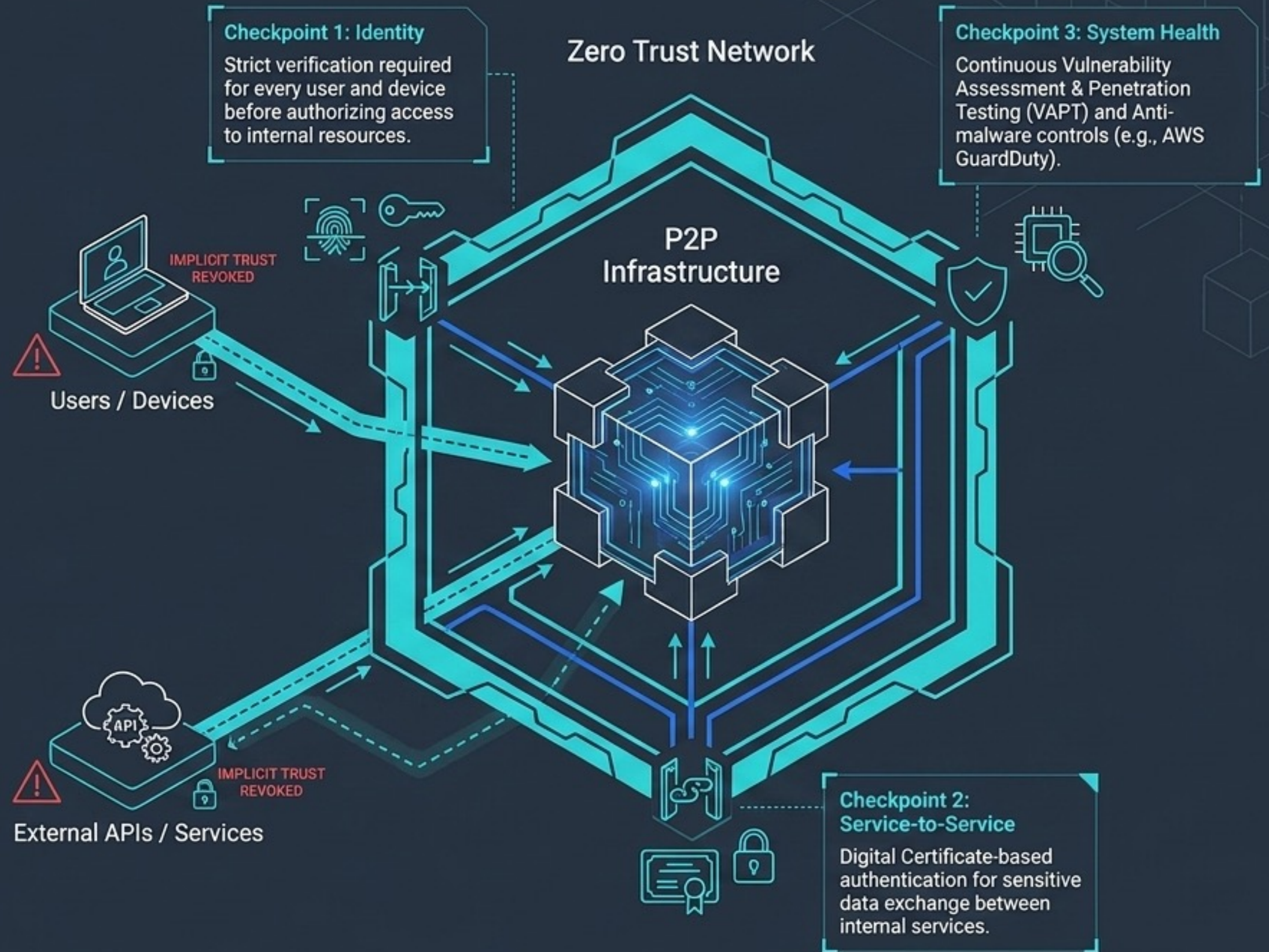
Absolute separation of Information Flow and Fund Flow



# Engineering for a Zero Trust Architecture

## Core Concept Block

The P2P entity must design infrastructure where implicit trust between components is assumed as revoked.



# The Cyberyog Technical Evaluation Framework

We translate RBI legal master directions into a precise, 6-module IT engineering sprint.



# Module 1 & 2: Identity & Access Management

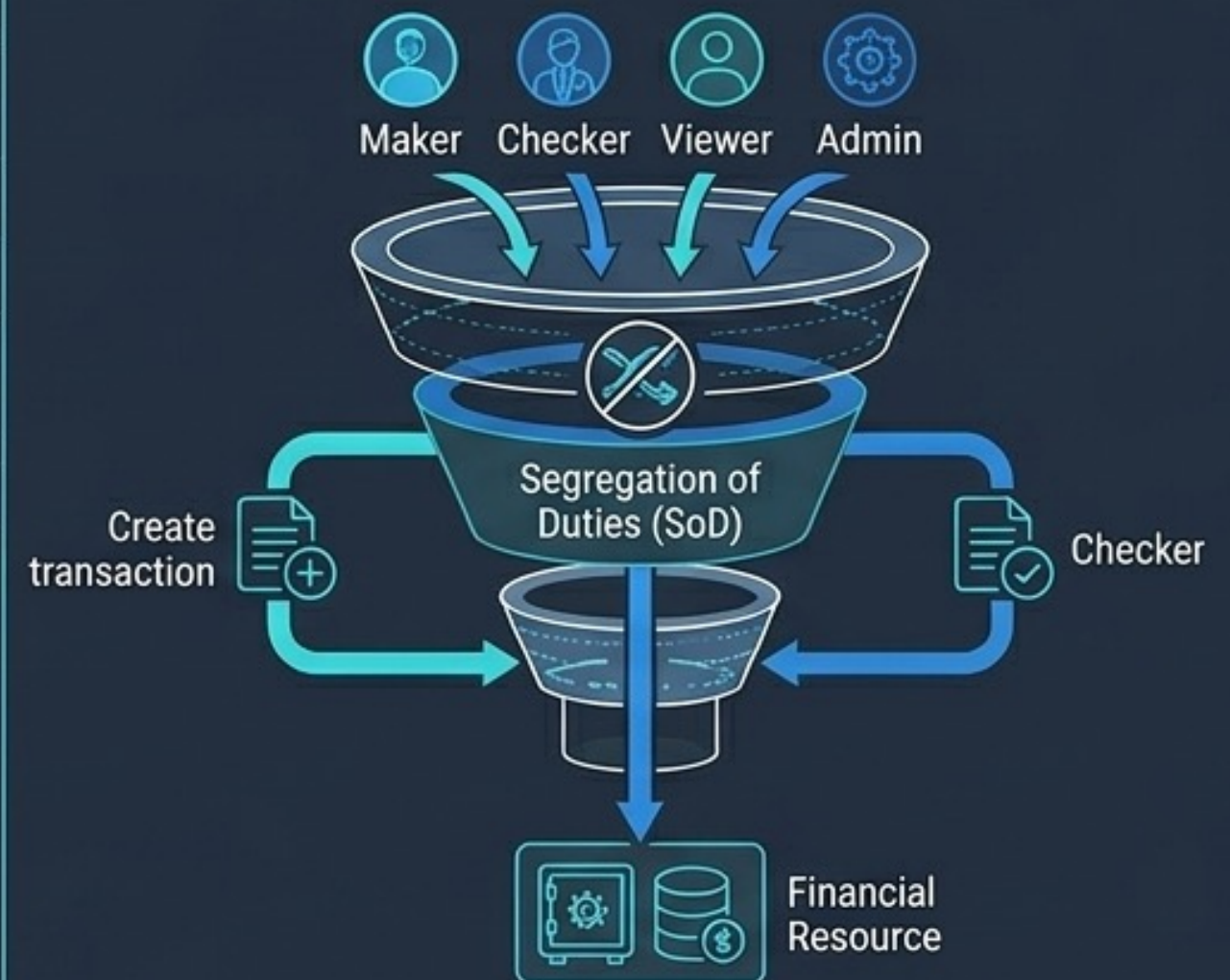
## Authentication Gate



### Authentication Checkpoints:

- **Centralized IAM:** All identities managed through tightly controlled IAM integration. No scattered local admin accounts.
- **Mandatory 2FA:** User-to-service access requires multi-factor authentication (User ID + OTP).
- **Session Control:** Lending portal sessions expire aggressively to prevent unauthorized access.

## Authorization Funnel



### Authorization Checkpoints:

- **The Maker-Checker Rule:** All financial systems configured for Segregation of Duties (SoD). Separate users must create and approve transactions.
- **Principle of Least Privilege:** Users inherit access strictly based on group membership. No add-on privileges.

# Module 3: Data Protection & Sovereignty

## Data Localisation Mandate

All data traffic (in motion and at rest) applicable to P2P lending operations must be absolutely restricted to the India Region.

## Audit Trail Requirements

- **12-Month Minimum:** Tamper-proof environment retention for all audit logs.
- **SPI Logging:** Every key event, authentication success/failure (with IP), and transaction impacting Sensitive Personal Information (passwords, financial data) must be logged at Network, OS, Database, and Application levels.
- **Database Audits:** Remote log storage for database-level administrative changes.

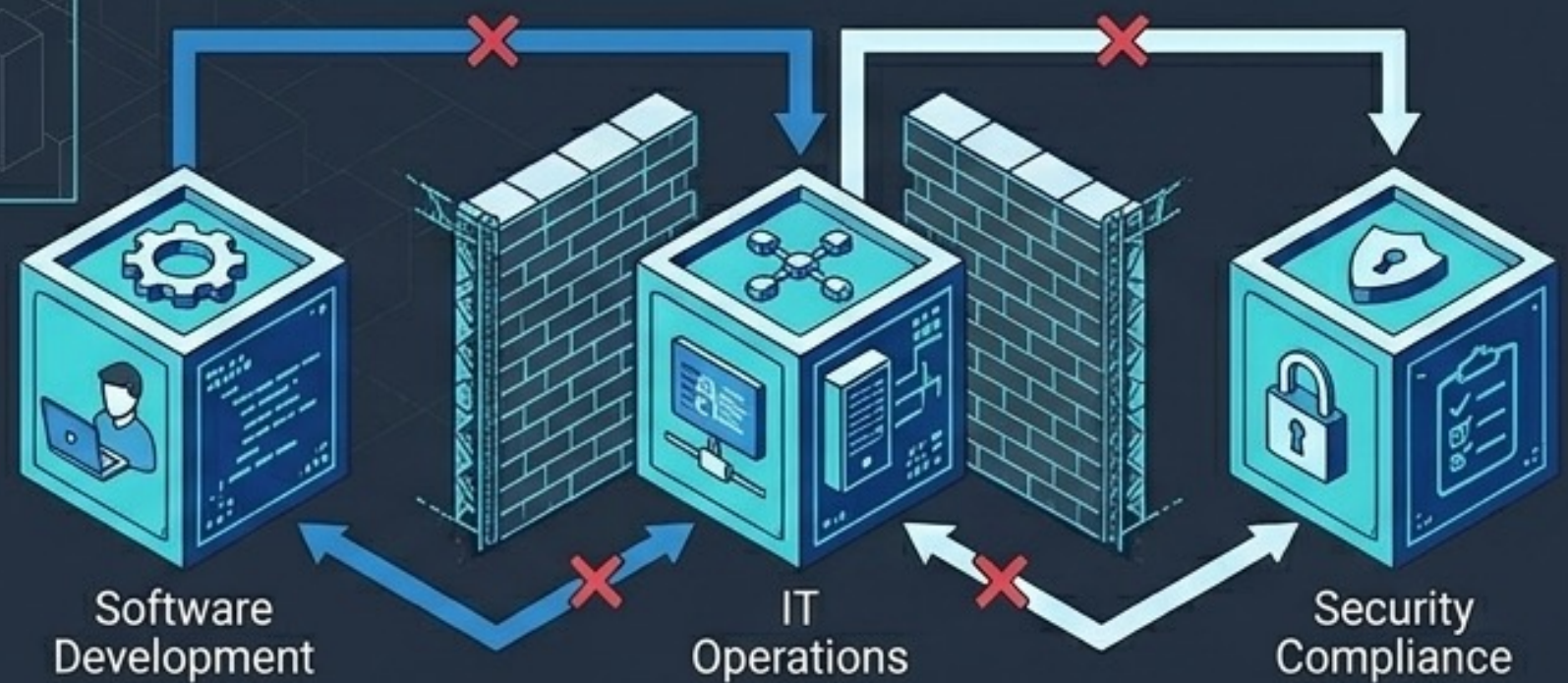


# Module 4 & 5: Operating Environment & BCP

## Strict Separation of Duties (SoD)

Clear operational walls must exist between:

- Software Development vs. IT Operations.
- Software Development vs. Security Testing.
- IT Operations vs. Security Compliance.



## Business Continuity & Incident Management

- **DRP:** Board-approved Disaster Recovery Plan with defined Recovery Time Objectives (RTO) and Recovery Point Objectives (RPO).



# Module 6: P2P Specific Mandates

## Participant Privacy

- **Borrower Data:** Disclose loan amount, interest sought, and credit score.
- **Lender Data:** Disclose proposed amount and rate. Personal identity and contact details must be strictly hidden.

## Explicit Consent & Transparency

- Robust mechanisms for explicit user consent before data sharing.
- Public website disclosure of the credit assessment methodology, portfolio performance, and NPA (Non-Performing Asset) metrics.

## The RBI Caveat

The platform must prominently display: Reserve Bank of India does not accept any responsibility for the correctness of any statements... and does not provide any assurance for repayment.

## Disclosure Screen



# From Legal Mandate to Engineering Sprint

The Cyberyog Technical Evaluation Checklist is not just an IT audit; it is a direct, 1:1 translation of RBI Prudential Norms and IT Governance Frameworks into a deployable engineering roadmap.



**The Result:** By executing our proprietary baseline security checklist, your platform achieves total alignment with RBI expectations—eliminating guesswork, preventing architectural rework, and drastically accelerating your path to the Certificate of Registration (CoR).

# Secure Your P2P License with Cyberyog

## Project Flightpath

### Phase 1: Gap Analysis & Architecture Review.

We evaluate your current tech stack against the P2P Zero Trust Framework and identify critical divergences.

### Phase 2: The Remediation Sprint.

Our consultants work directly with your engineering and compliance teams to implement Maker-Checker protocols, IAM, and 12-month SPI logging.

### Phase 3: Final Evaluation & Submission.

We finalize the Technical Evaluation Checklist and Network Architecture Diagrams required for your RBI application.



Initiate your compliance diagnostic today. [contact@cyberyog.com](mailto:contact@cyberyog.com)