

## **PRIVACY NOTICE AND POLICY**

Vardaan Equities Private Limited (“Vardaan Equities”), or any third party service provider, functionary, or agent appointed by Vardaan Equities acting on its behalf (together, the "Vardaan Equities", "we", "us", "our") are committed to protecting your personal data and are required, by Data Protection Legislation (as defined below), to provide individuals with certain information about how we use your personal information and sensitive personal information.

This privacy notice and policy ("Privacy Policy") explains what information we collect from you or you provide to us, how we use it and with whom we share that information. The Privacy Policy also sets out your rights and who you can contact for more information.

In this Privacy Policy:

- your information is sometimes called "personal data";
- your information is called "sensitive personal data" if it contains passwords, financial information such as details of bank account/ /other financial instruments, physical, physiological and mental health condition, sexual orientation, medical records and history, and biometric information;
- we may also sometimes collectively refer to handling, collecting, protecting and storing your personal data as "processing" such personal data; and
- the term "Data Protection Legislation" means applicable laws including Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (Privacy Rules).

For the purposes of Data Protection Legislation the data controller is Vardaan Equities.

1 What information we collect about you we may collect, record and use information about you in physical and electronic form and will hold, use and otherwise

process the data in accordance with Data Protection Legislation and as set out in this Privacy Policy.

The personal data we, collect and process may include:

- information obtained from identification documentation (including your name, contact details, nationality and national identify numbers (where applicable));
- your professional title, occupation and details of your employment;
- your age and marital status;
- financial information, tax status, account details and evidence of ownership of financial assets;
- personal identifiers such as your pan number, Aadhaar number, social security number, national insurance number, tax file number, IP address or our internal electronic identifiers;
- information which we or our service providers need to conduct 'know your client' checks such as details relating to your passport and credit history; and
- other information you provide in the course of your dealings with us or which we require to provide you with products and services.

The sensitive personal data we collect and process includes bank and demat account details.

We may also collect Aadhaar card related information from you pursuant to any statutory requirements applicable to us. You may also choose to provide your Aadhaar information for [identification or onboarding purposes]. Please note that for such purposes, it is not mandatory for you to provide Aadhaar information, and you may provide other identification documents . Apart from the purpose of providing services, we will not be sharing your Aadhaar information further with third parties without your explicit consent. We do not retain your Aadhaar information for longer than required for these purposes and will keep your Aadhaar information secure and confidential in accordance with applicable laws.

Please note that we collect the aforementioned sensitive personal data and Aadhaar information on the basis of your consent, which you provide us when you sign the terms of our agreement with us, for the collection, storage, use, processing, sharing and/ or transfer of such information, as applicable, in the manner provided under this Privacy Policy. In certain circumstances, we also collect and process certain special categories of

personal data, for money laundering, sanctions, financial crime, fraud prevention checks. Conducting the above-mentioned background checks may also sometimes result in Vardaan Equities obtaining information about actual or alleged criminal convictions and offences.

You are not obliged to provide us with your personal data or sensitive personal data where it is requested but we may be unable to provide certain products and services or proceed with your business relationship with us if you do not do so.

## 2 How we collect your information

The information we collect (or may collect in future) comes from:

- application forms or other materials you or your [authorised representative] submits to us during the course of your relationship with the Vardaan Equities;
- you or your authorised representative's interactions with us, transactions and use of our products and services (including the use of any our website);
- your or your authorised representative's business dealings us, including via email, telephone or as stated in contracts with you;
- cookies that uniquely identify your browser and store certain types of personal data each time you visit our website;
- depending on the products or services you or your authorised representative requires, third parties (including for credit and money laundering checks, among other things); and recording and monitoring tools that we use for compliance or security purposes (e.g. recording of telephone calls, monitoring emails, etc.).

## 3 How we use your information

Our primary purpose in collecting your personal information is to facilitate and accept your investment in Vardaan Equities products or services, the management and administration of your investment in Vardaan Equities products or services and any related administration on an on-going basis.

Additionally, we use your information for the following specific purposes:

- to process transactions and to improve the quality of the service that we provide to you;

- to disclose information to other third parties such as service providers of Vardaan Equities, auditors, regulatory authorities and technology providers for the purposes outlined in this Privacy Policy (as set out in more detail below)
- to communicate with you as necessary in connection with the proper portfolio management and alternative investment fund services;
- to update and maintain records and carry out fee calculations;
- to monitor and record calls and electronic communications;
- in connection with Vardaan Equities internal management and reporting;
- to report regulatory and tax related information to regulatory and tax authorities in order to comply with a statutory/ legal obligations.;
- to permit, administer and record your investment in Vardaan Equities;
- verifying the identity of the prospective investor to comply with statutory and regulatory requirements in relation to anti-money laundering procedures;
- in order to carry out actions which are necessary to comply with statutory/legal obligations in relation to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis;
- for prudential and risk management purposes;
- to provide you with any products and services that you request from us; and
- if it is necessary to use it for any other reason and that reason is compatible with the primary purpose.

#### 4 Legal grounds for using your personal information

Data Protection Legislation permits us to process your personal data in the way that we do because the processing is:

- necessary for the purposes of the legitimate interests that we pursue, which are to run and administer the products or services, to discharge our statutory/legal obligations, to store and disclose information where necessary and to evaluate, develop and improve our services; or necessary for the performance of a contract with you; or

- necessary in order to comply with a statutory/legal obligation to which we are subject.

To the extent that we process any sensitive personal data relating to you for any of the purposes outlined in clause 3 above or where we process your Aadhaar information, we will do so because you have given us your explicit consent to process that personal data in accordance with this policy.

## 5 Providing your information to third parties

The following categories of recipients may receive your personal data and process it for the purposes outlined in this Privacy Policy:

- third parties such as custodians, registrar and transfer agents, auditors, regulatory authorities, technology providers, agents, contractors, advisers, other service providers or related companies if this is necessary to manage your investments in Vardaan Equities, respond to your enquiries or for any other related purposes;
- any regulatory, supervisory or governmental authorities to the extent we are required by law to do so, and in certain other limited circumstances (for example if required by a court order or regulatory authority, or if we believe that such action is necessary to prevent fraud);
- tax authorities.

Vardaan Equities does not undertake marketing activities for third parties, nor does it provide information to third parties for their own marketing purposes.

In relation to transferring or disclosing your sensitive personal data to third parties, Vardaan Equities will ensure that such third parties adopt adequate security measures and safeguards as per applicable laws.

## 6 Transferring data outside of India

Vardaan Equities is incorporated and regulated in India and, as such, your personal data is stored either on secure systems within Vardaan Equities premise within India and /or with providers of secure information storage in India. Further, we may transfer, store or allow the transfer or storage of personal data about you to our service providers and other organizations outside India, with adequate safeguards to ensure your personal data remains adequately protected. Some of these destinations may not have data protection laws that are similar to those in India and may not be regarded by the Indian regulatory authorities as providing an adequate level of data protection. When we, or our permitted

third parties, transfer personal information outside India, we will aim to ensure that the transfer is subject to appropriate safeguards in accordance with Data Protection Legislation.

## 7 Automated processing

We do not carry out automated decision-making or profiling.

## 8 Your rights

At any time, you have the right:

- to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- to request access to or a copy of any personal data which we hold about you;
- to rectification of your personal data, if you consider that it is inaccurate;
- to ask us to delete your personal data, if you consider that we do not have the right to hold it;
- to withdraw consent to our processing of your personal data (to the extent such processing is based on such consent
- to restrict processing of your personal data (to the extent it does not impact provisioning of services);
- to data portability (moving some of your personal data elsewhere) in certain circumstances;
- to object to your personal data being processed in certain circumstances; and
- to have your grievances in relation to the processing of your personal or sensitive personal data resolved by the Compliance Officer (refer the details below).

Any request for access to or a copy of your personal data, or grievance redressal must be in writing in the manner provided under clause 13 of this Privacy Policy and we will endeavor to respond within a reasonable period in compliance with Data Protection Legislation. We will comply with our statutory/legal obligations as regards your rights as a data subject.

We will correct any incorrect or incomplete information of which we are aware and will stop processing your personal data, or erase it where there is no statutory/ legal reason for us to continue to hold or use that information.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know immediately if any of your personal details change.

#### 9 How long we keep your information

We will only keep the information we collect about you for as long as required for the purposes set out in this Privacy Policy or as long as required for us to comply with any statutory/legal obligations to which we are subject. This may involve us regularly reviewing our files to check that information is accurate, up-to- date and still required.

#### 10 How we protect your information

We ensure that there are appropriate technical, physical, electronic, and administrative safeguards in place to protect your personal data from unauthorised access in accordance with applicable law.

#### 11 Changes to Privacy Policy

This Privacy Policy may be amended from time to time without notice, in which case the date of this Privacy Policy will be revised.

Additionally, if our Privacy Policy changes in any way, we will place an updated version on our website and where required under applicable law take your consent for such updates.

#### 12 Other

This Privacy Policy is for your information and should not be used as the basis for any decision to purchase or redeem investments in Vardaan Equities managed products or services. The views and information expressed in this policy do not constitute and may not be relied upon as constituting any form of investment advice or inducement to invest, and prospective investors must obtain appropriate independent professional advice before making investment decisions.

## 13 Complaints

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to our Compliance Officer at:

Name: Chaitanya Agrawal

Email address: [compliance@vardaanequities.com](mailto:compliance@vardaanequities.com)

We will aim to redress your grievances expeditiously and within the periods prescribed under applicable law.