

## Privacy Policy

### 1. DEFINITIONS

For this Privacy Policy (hereinafter referred to as the "Policy"), wherever the context so requires:

- a. The term 'Company' or 'SBPFSL' shall mean Sharekhan BNP Paribas Financial Services Limited a company registered under the Companies Act, 2013 and having its registered office at The Ruby, 18<sup>th</sup> Floor, 29, Senapati Bapat Marg, Dadar (West), Mumbai-400028
- b. The term 'Website' shall mean <https://sharekhanfinance.com/>. SBPFSL is committed to protecting your privacy and utilising technology that gives you the most powerful, safe, online experience that you can get anywhere else.
- c. The term 'You', 'Your' & 'User' shall mean any legal person or entity accessing or using the services provided on this website, who is competent to enter binding contracts, as per the provisions of the Indian Contract Act, 1872.
- d. The terms 'We', 'Us' & 'Our' shall mean the Website/domain or Sharekhan BNP Paribas Financial Services Limited, and the Company (collectively referred to as the "Platform"), as the context so requires. This Policy will be applicable to the Company to the extent applicable under the IT (RSP) Rules (defined hereinafter), the DLG Guidelines (to the extent applicable) and the Digital Personal Data Protection Act, 2023.

### 2. GENERAL

- a. This Privacy Policy explains how we collect, use and protect information in relation. We are committed to safeguarding your privacy and ensuring that you continue to trust us with your personal data.
- b. This document is an electronic record in terms of Information Technology Act, 2000 and rules there under as applicable and the amended provisions pertaining to electronic records in various statutes as amended by the Information Technology Act, 2000. This electronic record is generated by a computer system and does not require any physical or digital signatures. This document is published in accordance with the provisions of Rule 3 (1) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 ("Intermediary Rules") that require publishing the rules and regulations, privacy Policy and Terms of Use for access or usage of the Platform. This Website is owned and operated by the Company.

### 3. SYSTEM DATA

SBPFSL uses your IP address to help diagnose problems with our server and to administer the Website. Your IP address is used to identify you and to gather broad demographic information.

### 4. REGISTRATION DATA

The Website's registration form may require users to give us contact information (like their name and e-mail address), unique identifiers (like their PAN Number) and demographic information (like their address, pin code, age or income level). The Website uses customer

contact information from the registration form to send the users information about SBPFSL and promotional material from some of SBPFSL's partners/services providers. The customer's contact information is also used to contact the visitor when necessary. Unique identifiers (such as PAN numbers) are collected to verify the user's identity. Demographic and profile data is also collected at the Website. We use this data to tailor the visitor's experience at the Website, showing them contents that we think they might be interested in, and displaying the contents according to their preferences.

By submitting your contact details to SBPFSL, you override your NDNC registration and authorise SBPFSL and SBPFSL's representatives/partner/service provider to contact you via a call, SMS, email, WhatsApp or any other digital mode/app in order to assist you with the to process/documents/KYC for Loan & Investment Account and any other assistance as you may require pursuant thereto

## **5. LINKS AND CO-BRANDED SITES**

This Website may contain links to other websites which are not necessarily been screened or reviewed by Sharekhanfinance.com. SBPFSL is neither responsible for the privacy practices or the contents of such websites nor shall be held answerable for the inaccurate, inappropriate or offensive data, material, information, products and services that may be viewed on those sites.

SBPFSL may operate a number of co-branded sites. Policies regarding information collection and sharing may differ on some of these co-branded sites. If you have any particular questions, you should check the privacy statement that appears on each co-branded site.

## **6. SURVEYS AND CONTESTS**

The Website's online surveys ask visitors for contact information (like their e-mail address) and demographic information (like their address, pin code, age or income level). The Website uses contact data from its surveys to send the user information about SBPFSL and promotional material from some of SBPFSL 's partners/service providers. The customer's contact information is also used to contact the visitor when necessary. Users may opt-out of receiving future mailings; see the choice/opt-out section below. Demographic and profile data is also collected at the Website.

## **7. DATA COLLECTED BY US**

- a. To create an account on the App or <https://sharekhanfinance.com/> website, you must provide us with the basic details and information required as part of our Customer Identification process and you agree to our user terms and conditions, policies and procedures available on our Website and this Privacy Policy, which governs how we treat your information. Website/App or the Company collects basic information required to provide customized services (for example: loan offers, content, more relevant ads), including your name, mailing address, postal code, job title, family details, employer details, phone number, PAN No., employment information, salary slips, declarations, your description and details in your account, financial information such as bank account etc. Such data is stored in our systems in accordance with Rule 3(h) of the Intermediary Rules and the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 ("IT RSP Rules") and the provisions under the Digital Personal Data Protection Act, 2023.

- b. All the information that you shall provide us is voluntary, including sensitive personal information. You understand that we may use certain information of yours, which has been designated as 'sensitive personal data or information' under the IT RSP Rules and/or and the Digital Personal Data Protection Act, 2023 for the purpose of providing you the services and for sharing the information only with affiliates such persons who are identified in this Privacy Policy who are subject to this Privacy Policy, as will be explained further below.

We collect the following types of data:-

**Data you provide us directly:**

- a. Personal contact information, including any information allowing us to contact you in person. It would include, but is not limited to, users' KYC details, borrowers'/users' academic information and documents, co-borrowers/users' financial documents, etc.
- b. Demographic information, including date of birth, age, gender, location. We may also collect the location data, if enabled by you to do so. Geolocation includes country of access, IP address, etc.
- c. User image, for us to cross check and verify the authenticity of the User and for prevention of fraud.
- d. 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);
- e. Consumer feedback, including information that you share with us about your experience in using our services (e.g. your comments and suggestions, testimonials and other feedback)
- f. We may collect the Usage data, including but not limited to access date and time, platform features and/or pages viewed, type of browser, hardware models, operating systems and versions, software, mobile network data, etc.
- g. The data collected, as mentioned above, is solely restricted to the above-mentioned activities and will not be in further used for any other purpose. In case we use the data for any other purpose, explicit prior consent shall be taken from the customers.
- h. We will desist from accessing mobile phone resources like file and media, contact list, call logs, telephony functions from user phone resources.
- i. We will ensure that access to camera, microphone, location or any other facility necessary for the purpose of on-boarding/ KYC requirements and only with the explicit consent of the user.
- j. We will ensure that biometric data is stored/collected in the systems, only in accordance with applicable law and the IT RSP Rules.
- k. We will ensure that all data is stored only in servers located within India, while ensuring compliance with statutory obligations/ regulatory instructions.
- l. You are provided with an option to give or deny consent for use of specific data, restrict disclosure to third parties, data retention, revoke consent already granted to collect personal data and if required, make the App (as defined under the DLG Guidelines) delete/forget the data. In case of withdrawal or modification of your consent or your amendment of any of your choices in this regard, we reserve the option not to provide the services or modify the services provided to you for which such information was sought.

**Collection of Information:**

Any personal information collected from the client would be collected in order to satisfy the following conditions –

- i. Compliance with KYC guidelines as per RBI Or any other Act or regulation requiring the same and any internal KYC guidelines formulated by SBPFSL

- ii. In order to provide enhanced trading experience to the client.
- iii. In order to provide any further information to be provided to regulators.
- iv. Such information may be collected in a manner that the client is always aware of the collection and purported usage of the same. The client shall have an option to withdraw consent to share the information. However, such intimation shall be required in writing. Such intimation shall only be taken into account from the date on which the same is received. SBPFSL may stop services in case such intimation is received in case the same is required under the regulations. Such information shall only be used for the purpose it is collected.

Further once the information is not required the same would be deleted provided the same is in compliance with the Regulatory requirements. Clients would be allowed an option not to disclose any information to be collected, provided the same is in compliance with regulatory requirements.

## **8. LOG DATA**

- a. Log file information is automatically reported by your device each time you make a request to access (i.e., visit) the application. It can also be provided when the content of the application is downloaded to your browser or device.
- b. When you use our application, our servers automatically record certain log file information, including your request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the application, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to our Users which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the application.

## **9. DISCLOSURE OF INFORMATION**

- a. Disclosure of sensitive information would be as per the terms agreed by the clients. For any change in such terms, the clients would be informed.
- b. Provided no consent may be required in case the same is being shared as per compliance guidelines or as required by regulators.
- c. We may transmit your name, mobile number(s) and email id(s) to our group and/or our affiliates and/or third-party providers should you choose to opt for any of the product and service offering(s) of our group and/or third-party service providers.
- d. SBPFSL and <https://sharekhanfinance.com/> shall not deliberately disclose customer's personally identifiable information to any unauthorized third person, save and except where such information shall be disclosed in good faith and for the purpose of law for the time being in force or to protect the rights and property of SBPFSL and <https://sharekhanfinance.com/>.
- e. Any information being disclosed to third parties would be in accordance with the Rules and would be done provided such third party has the same level of compliance guidelines as Sharekhan BNP Paribas Financial Services Limited.

Under certain circumstances we may be required to share the information given by you with the third parties, where we feel, they can contribute to add value and improve the quality of services imparted by us to you or where we bring to you financial products as distributors and you specifically choose to opt for. We shall take all reasonable steps to ensure that the confidentiality of your information is maintained by imposing confidentiality standards on all the third parties with whom we part this information. In all circumstances we shall ensure that your personal information is protected. We shall take all measures required to safeguard and protect your personal information

- f. SBPFSL shall allow clients to review their personal information and the same shall be allowed to be edited provided regulatory guidelines relevant to the same are followed. SBPFSL shall maintain, reasonable security practices and procedures and maintain a comprehensive documented information security programme. In the event of an information security breach, –SBPFSL or a person on its behalf shall be required to demonstrate, as and when called upon to do so by the agency mandated under the law, that we have implemented security control measures as per their documented information security programme and information security policies and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with the information assets being protected with the nature of business.

## **10. SECURITY**

The privacy and protection of your data and information provided to us is of vital importance. SBPFSL shall ensure to safeguard the security and confidentiality of any information you share with us. Any personally identifiable information of the customers obtained by us shall not be used or shared other than for the purposes to which the customers consent. However, security and confidentiality of information cannot be guaranteed cent percent. Hence despite our utmost efforts to protect your personal information, SBPFSL and Sharekhanfinance.com cannot warrant the security of any information you transmit to us through our online services. Such transmission of your personal information is done at your own risk.

## **11. COOKIES AND SIMILAR TECHNOLOGIES**

When you visit the application, we may use cookies and similar technologies to collect information about how you use the application and provide features to you.

## **12. PUBLIC FORUMS**

The Websites makes chat rooms, forums, message boards and/or news groups available to its users. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information.

## **13. SUPPLEMENTAL INFORMATION**

The Website supplements the information that you provide with information that is received from third parties.

Further to the above, in light of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, the following shall be deemed to be sensitive information –

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 Rules.

#### **14. REGULAR REVIEW OF PRIVACY POLICY**

We keep our Policy under regular review and may update the same to reflect changes to our information related practices. We encourage you to periodically review this page for the latest information on our privacy practices, your continued use and access of our platform will be taken as acceptance of the updated policy.

#### **15. GRIEVANCE REDRESSAL**

- (i) SBPFSL shall address any discrepancies and grievances of the provider of the information with respect to processing of information in a time bound manner. The Grievance Officer (details specified below) shall redress the grievances or provider of information expeditiously but within one month ' from the date of receipt of grievance.

Details of Grievance Officer:  
Name: Mr. Govind Lalwani  
Contact No.: 022 62263304  
Email ID: pno@sharekhanfinance.com