

PRIVACY & DATA PROTECTION POLICY

1. INTRODUCTION

The objective of this Data Protection Policy is to inform you of how Suraag Capital Management Private Limited (“SCMPL”), which provides or will provide services and/or products to you, as well as its representatives, affiliates and/or agents (collectively referred to herein as “SCMPL”, “we”, “us” or “our”), manages Personal Data (as defined below).

We request that you read this Data Protection Policy carefully, as it contains important information about what to expect when we collect Personal Data about you or from you and how we will use and/or disclose such Personal Data.

This Personal Data Protection Policy supplements but does not supersede or replace any consent you may have previously provided to SCMPL in respect of your Personal Data, and your consents herein are additional to any rights to which SCMPL may have at law to collect, use or disclose your Personal Data.

2. PERSONAL DATA

In this Data Protection Policy, “Personal Data” refers to any data about you or a Relevant Person such that you or such natural person (as the case may be) can be identified:

- (a) from that data; or
- (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Examples of Personal Data that you may provide to us include your name, company name, title, passport or other identification number, telephone number(s), mailing address, email address, account number, assets, income and financial situation, and any other information relating to any Relevant Person which you have provided to us in any forms submitted in connection with entering into or performing a contract to provide you with services.

When processing such Personal Data, SCMPL relies on contractual necessity as its lawful basis for processing.

We may also collect Personal Data from applications, forms or questionnaires completed by you, agreements entered into with us, or in the course of establishing or maintaining a customer relationship with us, including information relating to your financial situation, credit history, and transactions with us or with third parties who pro-

vide services to us. In such cases as well, SCMPL relies on contract as the lawful basis for processing.

We may additionally collect Personal Data by recording certain telephone calls between you and our employees, and storing such recordings, in order to satisfy legal or regulatory obligations or for legitimate business purposes.

Apart from Personal Data, we may also collect anonymous or aggregated information that does not identify a natural person, such as website usage statistics, in order to improve our services.

SCMPL and its associates may fetch, receive, store and capture Know Your Customer (KYC) information from Central KYC Records Registry (CKYCR), CVL KRA, CERSAI, or any other KYC registration agency as permitted under applicable law. Such information may include personal identification details, financial information and supporting documentation pertaining to investors and/or related persons. This process is undertaken strictly in accordance with the guidelines and circulars issued by the Securities and Exchange Board of India (SEBI).

3. PURPOSES FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

SCMPL collects, uses and discloses Personal Data for the following purposes (“Purposes”):

- a. Processing applications for account opening, account maintenance and operations, including processing transactions and closing accounts;
- b. Providing services and/or products to you (including services provided by third-party service providers);
- c. Administering and managing the relationship between you and SCMPL;
- d. Carrying out your instructions or responding to your enquiries or feedback;
- e. Conducting identity verification, KYC, customer due diligence, credit checks, screening and ongoing monitoring as required under applicable laws, regulations and internal policies, including those relating to anti-money laundering, counter-terrorist financing, bribery and corruption;
- f. Preventing, detecting and investigating fraud, misconduct or unlawful activity and managing related commercial risks;
- g. Complying with all applicable laws, regulations, rules, directives, orders and requests from regulatory, governmental, tax or law-enforcement authorities (whether domestic or foreign);

- h. Managing SCMPL's business operations, infrastructure, systems, audits, accounting, risk management and business continuity;
- i. Addressing complaints, claims or disputes;
- j. Developing new services or products and informing you about updates;
- k. Unless you have opted out, providing marketing, advertising or promotional communications relating to financial, investment or related services offered by SCMPL;
- l. Carrying out research, planning, analytics and statistical analysis;
- m. Organising events and investor communications;
- n. Enforcing contractual or legal rights, including recovery of dues; and
- o. Any incidental or ancillary purposes related to the above or as agreed by you from time to time.

SCMPL does not sell or rent Personal Data to third parties.

4. CONSENT

SCMPL may use Personal Data to provide you with information about services similar to those you have engaged us for or enquired about, including newsletters or updates.

Such communications will be sent only where we have obtained your consent or where we have determined that a legitimate interest exists. In assessing legitimate interest, SCMPL balances its interests against your rights and reasonable expectations.

You may opt out of such communications at any time by contacting us using the details provided below.

Withdrawal of consent may limit SCMPL's ability to continue providing certain services and may result in termination of the relationship, where applicable.

Where applicable law permits collection, use or disclosure of Personal Data without consent, such legal permissions shall continue to apply.

5. DISCLOSURE, SHARING AND OVERSEAS TRANSFERS

Subject to applicable law, Personal Data may be disclosed or transferred to:

- a. Third-party service providers including registrars, custodians, RTAs, depositories, archival service providers, payment processors and technology vendors;
- b. Professional advisers including lawyers, auditors, consultants and brokers;

- c. Regulatory bodies, statutory authorities or governmental agencies;
- d. Courts, tribunals or entities as required by law; and
- e. Successors or assigns of the above.

Where Personal Data is transferred outside India, SCMPL shall ensure compliance with applicable data protection laws and that comparable safeguards are in place.

6. ACCURACY, ACCESS AND CORRECTION

You may request access to, correction or updating of your Personal Data by contacting us in writing. SCMPL reserves the right to deny access in exceptional circumstances, as permitted by law, and will provide reasons where required.

7. RETENTION & ERASURE

SCMPL retains Personal Data only for as long as necessary to fulfil the purposes for which it was collected and as required or permitted under law.

Personal Data is securely deleted or anonymised when retention is no longer necessary.

Certain records, including contracts, KYC documentation, transaction records, communications, suitability assessments and complaints, may be retained for up to 8 years following termination of the relationship, in line with legal and regulatory requirements.

8. DATA SECURITY

SCMPL maintains reasonable technical and organisational safeguards to protect Personal Data from unauthorised access, use, disclosure or loss.

While we take reasonable steps to protect data transmitted over the internet, no method of transmission is entirely secure, and users are encouraged to take precautions when sharing Personal Data online.

9. UPDATES TO THIS POLICY

This Data Protection Policy may be updated periodically to reflect legal, regulatory or operational changes. Updates will be posted on SCMPL's website and shall take effect upon publication.

10. SUBJECT ACCESS REQUESTS

SCMPL will respond to subject access requests within one month of receipt. Where requests are complex, this period may be extended by up to two additional months, with notice provided to you.

11. YOUR RIGHTS

Subject to applicable law, you have the right to:

- Object to processing of Personal Data for marketing purposes;
- Restrict processing causing unwarranted harm or distress;
- Be informed about automated decision-making;
- Lodge a complaint with the appropriate data protection authority.

Identity verification may be required before processing requests.

12. THIRD-PARTY WEBSITES

Our website may contain links to third-party websites. SCMPL is not responsible for the privacy practices of such websites, and users are advised to review their privacy policies.

13. THIRD-PARTY PERSONAL DATA

If you provide Personal Data relating to another individual, you confirm that you are authorised to do so and that the individual has been informed of this Privacy Policy.

14. CONTACT DETAILS

For queries, complaints or requests relating to Personal Data, please contact:

Suraag Capital Management Private Limited

Email: contact@suraagcapital.com