

PRIVACY STATEMENT

Nuvama Wealth Management Limited (**NWML**), its subsidiaries and associates including entities in overseas jurisdictions (collectively referred to as **Nuvama / we / us**) respect your privacy, care about the way in which your Personal Data/Information is treated and are committed to protecting your Personal Information/Data.

This Privacy Statement of Nuvama (**Privacy Statement**) sets forth the security practices and procedures adopted by Nuvama and will apply to the collection, storage, use, processing and disclosure of Personal Information (*defined hereinbelow*) provided by you in your capacity as a customer or user or visitor of Nuvama Group website i.e. www.nuvama.com and all other websites of Nuvama (collectively referred to as Nuvama websites) or at the time of customer onboarding while availing the products and services provided by Nuvama.

Personal Information or **Personal Data** (used interchangeably) means and includes (i) any information relating to you as a natural person, which in combination with other information available is capable of identifying such a person and includes, *inter alia*, your name, age, gender, date of birth, photo, identification number, location data, contact details, email address, IP address, online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity; and (ii) sensitive personal information including information relating to health, finance, bank account or any other payment instrument details, medical records, sexual orientation, political opinion, biometric information etc.

By accepting this Privacy Statement and the Terms and Conditions of use of the Nuvama Websites, you expressly consent to our use and disclosure of your Personal Information in the manner prescribed in this Privacy Statement. This Privacy Statement is incorporated in, governs the use of and is subject to the Terms and Conditions of use of the Nuvama Websites.

PERSONAL INFORMATION OR PERSONAL DATA

Nuvama and its authorised third parties will, based on your requirements for our products, services and our business relationship and as required under applicable laws and regulations collect the necessary Personal Information.

Nuvama will only use your Personal Information for the purpose for which it has been collected unless we consider that we need to use it for any other reason which is compatible with the original purpose. In that event we will notify you and explain the reasons to you.

By sharing your Personal Information and by giving your consent if required by the laws applicable to you, you are deemed to have read, understood and consented to be bound by this Privacy Statement.

COLLECTION OF PERSONAL INFORMATION

Nuvama may, in addition to receiving Personal Information from you, collect and use your Personal Information from the following direct and indirect sources:

Online:

- Information about your use of the Nuvama Websites
- Information that you provide for the purpose of registering with Nuvama Websites, mobiles applications, programs of Nuvama;
- Information about transactions carried out over the Website and all our other websites;
- Information about you on social networking sites;
- Information that you provide for the purpose of subscribing to our services.

Offline:

- Information about you collated from application and proposal forms, call centre communications, meetings, discussions on a one on one basis;
- Any other Personal Information that is received by Nuvama through its service providers.

COLLECTING AND PROCESSING OF PERSONAL INFORMATION

Why we collect your Personal Information

The Personal Information that we collect from you is, to the best of our knowledge and belief held and used in accordance with applicable laws and regulations of India, overseas jurisdictions where we have a presence and held (a) in accordance with the EU General Data Protection Regulation [Regulation (EU) 2016/679] (**EU GDPR**) in respect of all natural persons to whom EU GDPR is applicable and (b) in accordance with the Data Protection Act 2018 (**UK GDPR**) in respect of all natural persons to whom UK GDPR is applicable. Collectively EU GDPR and UK GDPR are referred to as GDPR in the Privacy Statement and other documents related to GDPR requirements. Nuvama will, subject to the laws applicable to you, either require you to give your express consent signifying your agreement to the processing of Personal Information relating to you or where express consent is not received and is not required under the laws applicable to you, your silence will be treated as deemed consent to the processing of your Personal Data. Nuvama may use and process your Personal Information, for a number of lawful purposes in connection with our business, including but not limited to the following:

Processing of Personal Information	Legal basis for processing
Collection of personal data	<ul style="list-style-type: none"> • To register you as a new customer • To process your order of products/services • To meet our obligations under our contract with you • Enable your access to and use of the services of the Nuvama websites • To meet regulatory requirements and other legal & statutory provisions • To update your account related records • Processing becomes necessary in the public interest • To manage our relationship with you
Sending you information pertaining to your account	<ul style="list-style-type: none"> • To meet our obligations under our contract with you • Send you statements and invoices • Providing you with products/services requested • To meet regulatory requirements and other legal & statutory provisions • To update your account related records • To verify your identity

Processing of Personal Information	Legal basis for processing
Recording of personal data and analyse any communications between you and us including phone calls	<ul style="list-style-type: none"> • To meet our obligations under our contract with you • To meet regulatory requirements and other legal & statutory provisions • To personalize the Nuvama websites for you • To collect payments from you • To check your instructions to us and to prevent and detect fraud and other crime • To provide best customer experience • To assess our services to customers, for training and enhancing customer service • To carry out customer analytics and deliver customised content • To carry out client screening/profiling
Organising, structuring & storage of personal data	<ul style="list-style-type: none"> • To meet our obligations under our contract with you • To customize our service offerings • To send you information in respect of services customized for you
Disclosure of your information to Indian Tax authorities, RBI and other Statutory and Governmental authorities and Indian and overseas regulators and authorities	<ul style="list-style-type: none"> • Where the applicable law requires this to be done
Deletion, destruction, retention of personal data	<ul style="list-style-type: none"> • In the event that our contract with you comes to an end • To meet regulatory requirements

CONSENT AND WITHDRAWAL OF CONSENT

Nuvama may obtain either your written consent (which includes consent in electronic form) or your deemed consent as per the applicable laws before collecting Personal Information for contacting you for the purpose of providing our products and services and processing your Personal Information.

You have the right at any point of time to withdraw your consent to the processing of your Personal Information by informing us in writing (which includes electronic form). On withdrawal of your consent, your contract with Nuvama shall come to an end as per the terms agreed between us.

OUR COMMUNICATION

We may communicate with you through electronic mail. We may use your Personal Information from time to time to inform you by letter, text messages, email or other means about services which may be of interest to you.

You will receive promotional/marketing material from us if you have requested for the same or if you have provided your name and other Personal Information or if you have provided your consent as maybe required under the applicable laws, while registering for a marketing contest/promotion and in

case you have not opted out of receiving such communication. You will have the right to 'Opt Out' or 'Exit' out of receiving promotional / marketing information about our other products and services.

SECURING YOUR PERSONAL INFORMATION

Nuvama will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your Personal Information. Nuvama maintains strict security systems designed to prevent unauthorised access to your Personal Information by anyone, including our staff. Nuvama will store all the Personal Information you provide in a secure environment protected from unauthorised access, modification or disclosure. Personal Information relating to electronic transactions entered into via the Website are protected by encryption technology. Where you have chosen a password which enables you to access certain parts of the websites of Nuvama, you are responsible for keeping the password confidential. Do not share your password with anyone.

SHARING, TRANSFER, DISCLOSURE OF PERSONAL INFORMATION

Nuvama treats your Personal Information as private and confidential and does not reveal it to any third parties except where such action is necessary to comply with legal and regulatory requirements or to protect and defend the rights of its customers.

Subject to the above, Nuvama may disclose and/or transfer your Personal Information to third parties in cases it is necessary for providing services to you and/or if you have expressly or you have deemed to have consented for the same.

We may share your Personal Information without obtaining your prior written consent, with government agencies mandated under the law to obtain information for the purpose of verification of identity or for prevention, detection, investigation or where disclosure is necessary for compliance of a legal obligation.

Where Nuvama discloses your Personal Information to its agents or sub-contractors for these purposes, the agent or sub-contractor in question will be obligated to use the Personal Information in accordance with, *inter alia*, the confidentiality terms and conditions contained in the agreements entered into with them. Nuvama or its agents and/or sub-contractors may use your Personal Information to contact you for promotion of its products/schemes etc. or those of its business partners, from time to time. You hereby agree and understand that such promotional calls shall be made to you unless you expressly convey in writing (which includes electronic form) to Nuvama that you should not be called further for such promotions, schemes etc.

In addition to the disclosures reasonably necessary for the purposes identified herein, Nuvama may disclose your Personal Information to any third party to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights or for service arising out of contractual obligations.

Cross-Border Transfers: Personal Information that Nuvama collects from you may be stored and processed in and transferred between any of the countries in which Nuvama operates to enable the use of the same in accordance with this Privacy Statement. You agree to such cross-border transfers of your Personal Information.

YOUR RIGHT TO DISPOSAL OF PERSONAL INFORMATION AND OUR RIGHT TO RETENTION OF PERSONAL INFORMATION

You are entitled to removal/disposal of your Personal Information upon expiry/termination of your contractual relationship with Nuvama. You may write to us for this purpose. You, however, understand that your right to removal/destruction shall be subject to Nuvama's legal and regulatory obligations to maintain and retain such records in order to comply with applicable law and judicial /quasi-judicial orders, to resolve disputes, if any, to which we are subject or as long as required to provide you with services. You would however like to note that all such Personal Information will never be completely removed from our systems due to technical and legal constraints.

UPDATE YOUR PERSONAL INFORMATION

In the event that any part of your Personal Information as collected by Nuvama is incorrect or inaccurate or there is a regulatory obligation to update or you wish to modify your Personal Information, you may write to Nuvama to have it suitably rectified and/or updated.

USE OF COOKIES

Nuvama uses cookies (i.e. text files containing small amounts of information) which are downloaded to your device in order to provide a personalised browsing experience. Cookies, among other things, allow you to navigate between pages efficiently, remember your preferences and generally improve your browsing experience. All information collected by cookies is aggregated and anonymous. By using the Nuvama Websites, you agree that these types of cookies can be placed on your device. You are free to disable /delete the cookies by changing the browser settings. Nuvama is not responsible for cookies placed in your device by any other website and information collected thereto.

CHANGES TO OUR PRIVACY STATEMENT

We reserve the right to update this Privacy Statement at any time in future by posting a new version on the Nuvama Websites. We recommend that you re-visit this page regularly to ensure you are familiar with any changes.

OTHER WEBSITES

Nuvama Websites contains links to other third party websites. Nuvama is not responsible for the privacy policies or practices of any third party or for any third party linking the Nuvama Websites to its website. Once you leave Nuvama Websites, the information provided by you will be governed by the privacy policy of the owner of the site you are visiting. You need to keep yourself informed of these privacy policies.

CONTACT US:

If you have any questions about this Privacy Statement or Nuvama's treatment of your Personal Information or rectification of your Personal Information, please write to us:

By email: dataprotectionoffice@nuvama.com or

By post:

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