

We, at IIFL Wealth Advisors (India) Private Limited ('IIFLWAI'), respect investors/customers/clients right to privacy.

We recognise that the lawful and correct treatment of personal data is very important to maintain investor's confidence in ourselves. It is our endeavor to ensure that any personal data that we collect, process, record or use in any way whether it is held on paper, on computer or other electronic media will have appropriate safeguards in place to comply with our obligations of confidentiality and privacy.

In this regard, we request investors/clients/customers to kindly read this "Policy on Privacy and Security of Information" carefully.

The terms as may be used in this document would be in accordance with "The Information Technology Act 2000 as amended till date, Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011" and such other rules/regulations and Circulars as may be applicable.

Interpretation

- All references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa. All references to client/customer/investor whether masculine or feminine include references to non-individuals also unless repugnant to the context thereof;
- Any reference to any statute or statutory provision shall be construed as including a reference to any statutory modifications or re-enactment therein from time to time;
- Headings are for ease of reference only.

The Policy

IIFLWAI, a Company incorporated under the Companies Act, 1956. For the purpose of this Privacy Policy, wherever the context so requires the term "You" or "User" shall mean any natural or legal person including online and offline investors and the term "We", "Us", "Our" shall mean IIFLWAI.

IIFLWAI either directly or through third party service providers engaged by IIFLWAI (Service Providers) such as the Registrar and Transfer agents collects, receives, possesses, stores, deals or handles information received from investors/client/customers whether existing or prospective.

Such information can be personal and sensitive in nature as per the indicative list given below:

- Name, gender, residential / correspondence address, telephone number, date of birth, marital status, email address or other contact information
- PAN, Aadhaar, KYC Status, Signature and Photograph
- Bank Account details change of bank account details or registration of multiple bank accounts etc. through application forms;
- Payment instrument details at the time of submitting application at the time of investment or as proof for carrying out change of bank account or any other details of debit card obtained (if any);
- Generation and storing password (PIN) in encrypted form based on the request from the investor under the online mode of investments;
- Biometric information obtained, if any;
- Demat Account details like beneficiary account no. etc.;
- Annual Income and savings profile; and

- Other information as may be considered as sensitive and personal.

The aforesaid information is being collected by IIFLWAI /Service Providers to respond to your requests, to process the investment applications and to also ensure safe subscriptions/redemptions through points of acceptance in physical form, website, online portals, Automated Teller Machines and such other mode. IIFLWAI may also call the investors to inform them with respect to the other products or services offered by IIFLWAI. The said information is also being collected to be compliant with the Know Your Client (KYC) norms under the Prevention of Money Laundering Act, 2002, (PMLA), the rules issued thereunder, and guidelines and circular on Anti- Money Laundering issued by SEBI and SEBI (Mutual Funds) Regulations, 1996 as amended till date.

The aforesaid information is the basis of our ability to provide investors/clients/customers with good, qualitative, timely and efficient service, while also keeping the information and data provided totally secure and confidential. You always have the right to refuse or withdraw your consent to share/dissemination of your Sensitive Personal Data or Information by contacting the customer care. However, in such an event, you would no longer avail the services of IIFLWAI.

We endeavor to have suitable technical, operational and physical security controls and measures to protect investors/customers/clients personal/sensitive data or information that are commensurate with the nature of our business at all times.

We permit only authorized employees who are trained in the proper handling of customer information, to have access to aforesaid information. We would ensure to enter into suitable terms with third party service providers in order to protect client confidentiality and follow a non-disclosure or restricted disclosure policy. Further, the employees who violate the privacy and confidentiality promise shall be subjected to disciplinary action.

We shall reveal only such information to external authorities as may be found relevant and necessary in order to comply with the applicable laws of the land and to third party service providers to ensure smooth functioning of the activities as may be prescribed under applicable laws like Registrar and Transfer Agents/distributors/banks/sub-brokers/call-centers/custodians/depositories and such other entities/persons. By using our website or by agreeing to transact with us, you agree to the above sharing of information during your relationship with us. We may also be required from time to time to disclose investors/customers/ clients personal information to governmental or judicial bodies or agencies or our regulators based on their requirement to comply with the applicable laws including cyber laws. In addition to the above we may also use the information shared by investors/clients/customers to contact investors/clients/customers regarding the products and services offered by us and seek feedback on the services provided. Further, such information may also be used by us to generate statistics and reports and/or to protect and defend the rights, interest and property of the IIFL WAI. Further, it may be noted that Internet Protocol (IP) addresses, browser supplied information and site session information may be recorded as part of the normal operations and for security monitoring purposes.

Nevertheless, it is our foremost endeavor to ensure that the Customer's Privacy is protected at all points in time). We understand clearly that You and Your Personal Information is one of our most

important assets. The customers/clients (whether existing/prospective) must ensure to recheck the information or data being provided to IIFLWAI or any person acting on its behalf. In case if any of the data/information is found to be inaccurate or incorrect, the same shall be informed to IIFLWAI for immediate amendment. IIFLWAI and any person acting on its behalf shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by the customers/clients (whether existing/prospective). We store and process Your Information including any sensitive financial information collected (as defined under the Information Technology Act, 2000), if any, on computers that may be protected by physical as well as reasonable technological security measures and procedures in accordance with Information Technology Act 2000 and Rules there under. If You object to Your Information being transferred or used in this way, please do not provide the details of your information on the Website.

Our website may use cookies. By using our website and agreeing to these terms of use, you consent to our use of cookies in accordance with the terms of our privacy policy.

Links To Other Web Sites:

Our website sometimes has links to other website(s) in the World Wide Web. The privacy policies of these website(s) are not under our control. Once you leave our servers, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting. It is advisable to read their privacy policies for further information. Your browsing and interaction on any other Web site, including those that have a link on our Web site, is subject to that Web site's own rules and policies. It is advisable to read their privacy policies for further information. Investors/ Customers/ Clients shall not be covered by the terms of this Policy if they access other websites using links from this website.

IIFLWAI uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. IIFLWAI cannot, however, ensure or warrant the security of any information you transmit to IIFLWAI and you do so at your own risk. Once we receive your transmission of information, IIFLWAI makes commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

To protect your privacy and security, IIFLWAI take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from IIFLWAI, at all times. Further, despite our efforts to protect investors/customers/clients privacy, if unauthorized persons breach security control measures and illegally use such sensitive/personal data or information, IIFLWAI and its affiliates and directors shall not be held responsible/liable.

Communications:

When You use the Website or send emails or other data, information or communication to us, you agree and understand that You are communicating with Us through electronic records and You consent to receive communications via electronic records from Us periodically and as and when

required. We may communicate with you by email or by such other mode of communication, electronic or otherwise.

Amendments/Modifications

This Privacy Policy available on our website is current and valid. However, IIFLWAI reserves the right to amend/modify any of the sections of this policy at any time and the clients/customers/investors are requested to keep themselves updated for changes by reading the same from time to time.

Retention of information/data

It may be noted that we may retain the data as may be provided by the client/investors/customers till such time as may be provided under the law and as required to efficiently provide service to the clients/investors/customers.

Grievance redressal

If investors/customers/clients have any concerns relating to their personal and sensitive information they may be addressed to Ms. Anita Sampath (anita.sampath@iiflw.com).

Investors/clients/customers shall have expressly consented to the terms of this Policy if they enter and use this website or provide any information while transacting with us.