

PRIVACY POLICY

Welcome to Kalpalabdhi Financials Private Limited. The domain name www.kalpalabdhi.com (hereinafter referred to as "Website") is owned by Kalpalabdhi Financials Private Limited a company incorporated under the Companies Act, 1956 with its registered office at Shop1A, Hare Krishna Nagar Building, Jawahar Road, Near Samrat Hotel, Opp Ghatkopar Railway station, Ghatkopar East, Mumbai 400077 (herein after referred to as "KLFS").

This policy covers the processing, storage and access to Information as required under lawful and/or contractual activities with Kalpalabdhi Financials Private Limited or otherwise required in the normal course of business. It describes KLFS's policies and procedures on the collection, usage and disclosure of Information provided/received by natural persons and meets the requirements established under:

The Information Technology Act, 2000 – Section 43A

The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011.

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 clients and the term "We", "Us", "Our" shall mean Kalpalabdhi Financials Private Limited.

We at Kalpalabdhi Financials Private Limited respect the privacy of everyone who visits this website or mobile applications and are committed to maintaining the privacy and security of the personal information of all visitors to this website. We view protection of your privacy as a very important principle. We understand clearly that You and Your Personal Information is one of our most important assets.

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.

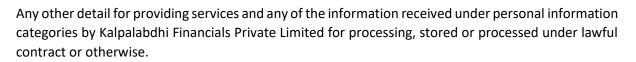
We and our affiliates will share/sell/transfer / license / convey some or all of your personal information with another business entity to carry out any business activity or re-organization, amalgamation, restructuring of business or for any other reason whatsoever. Once you provide your information to us, you provide such information to us and our affiliate and we and our affiliate may use such information to provide you various services with respect to your transaction conducted on www.kalpalabdhi.com.

Our policy on the collection and use of personal information and other information is outlined below.

Collection of Sensitive Personal Data or Information

Kalpalabdhi Financials Private Limited may for the purpose of rendering its services, collect personal information such as:

Name, Gender, Residential / Correspondence Address, Telephone number, Date of Birth, Marital status, Email address or other contact information; PAN, KYC Status, Signature and Photograph; Bank account, Medical Records and history or other payment instrument details;



KALPALABDHI

Please note 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 information.

Kalpalabdhi Financials Private Limited offers online platform System for carrying out trade transaction that collects that collects such personal data or information to process your financial and non-financial transaction requests. The information so collected may be shared with SEBI/ NSE/ BSE/ MCX /Asset Management Companies of Mutual Funds / Registrar and transfer Agents / Collecting Banks /KYC Registration Agencies (KRAs) etc. solely for the purpose of processing your transaction requests or serving you better.

The information collected shall be used for the purpose for which it has been collected. Kalpalabdhi Financials Private Limited shall not use or disclose Information for purposes other than as mentioned in this policy, except with the consent of user providing such Information or as required by law. However, KLFS may be legally required to disclose the Information in the following cases:

Where the disclosure is necessary for compliance of a legal obligation;

Where mandated under the law by government agencies to disclose such Information. KLFS or its authorized agents shall not retain or store that information for longer than is required for the purposes except when the information may lawfully be used or is otherwise required under any other law for the time being in force. In the event that law enforcement agencies or other third parties obtain access to the information, KLFS shall not be held liable for any subsequent use or disclosure of that information by such parties.

Neither KLFS nor its representatives shall be responsible for the authenticity of such personal data/ Information provided to us. By agreeing to avail the service offered by KLFS you have agreed to the collection and use of your Sensitive Personal Data or Information by KLFS. 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 KLFS.

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.

Log File Information Collected and Stored Automatically

If you visit/ log into our website just to browse, read pages or download information, we gather and store certain information about your visit automatically. This information cannot and does not identify you personally. When you register with or view our site, our servers automatically record certain information that your web browser sends whenever you visit our website. The kind of information



that is gathered automatically include the type of browser you are using (e.g. Internet Explorer, Firefox, etc.), the type of Operating System you are using (e.g. Windows or Mac OS) and the domain name of your Internet Service Provider, the date and time of your visit and the pages on our website. We sometimes use this information to improve our website(s) design, content and primarily to give you a better browsing experience. This notice / policy is not intended to and do not create any contractual or other legal rights in favour of any user or viewer of www.kalpalabdhi.com or on behalf of any other party. However, users and viewers are informed that by using the website www.kalpalabdhi.com, they are deemed to have consented to the collection and use of information by KLFS as stated above.

Updating or Reviewing Your Sensitive Personal Data or Information

You may upon written request to us review the sensitive personal data or information provided. KLFS shall ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible.

Reasonable Security Practices for Protecting Information

KLFS uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. KLFS cannot, however, ensure or warrant the security of any information you transmit to KLFS and you do so at your own risk. Once we receive your transmission of information, KLFS 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, KLFS 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 KLFS, at all times.

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.

Notification Procedures

KLFS provide notifications, whether such notifications are required by law or are for marketing or other business-related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our Website page, as determined by KLFS in its sole discretion. we reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

Changes to Our Privacy Policy

Please note that this policy may change from time to time. If KLFS change its privacy policies and procedures, we shall post those changes on our website to keep you/users aware of what information we collect, how we use it and under what circumstances we may disclose it. Changes to this Privacy



Policy are effective when they are posted on this page. Please visit our website to keep yourself abreast of any changes to this policy.

For feedback or concern, if any, kindly contact: grievance@kalpalabdhi.com