

## **Bandhan AMC Limited Privacy Policy**

Bandhan AMC Limited (hereinafter referred to as “the AMC” or “Bandhan AMC” or “we” or “us”), in the course of our business and while dealing with our investors, clients, distributors, mobile app users and website users (hereinafter referred to as “Provider(s) of Information” or “you” or “your”), may become privy to your Personal Information, including information that is confidential in nature.

By accepting the terms and conditions of the website, mobile application or through physical means, you have expressly agreed and acknowledged that you have read all the contents of our disclaimer, terms and conditions on our website ([www.bandhanamc.com](http://www.bandhanamc.com)) and this Privacy Policy carefully and also acknowledge that you are aware of the Personal Information that is being collected by us and the manner in which the said Personal Information shall be handled and dealt with and its usage.

We, at Bandhan AMC, are strongly committed to protecting the privacy of your Personal Information. This Privacy Policy (as amended from time to time) describes how we collect, use and retain your Personal Information, vide various avenues including but not limited to usage of the various services both in the physical (offline) and online/electronic mode. Such Personal Information collected by us through physical/offline and online/electronic mode may be converted and stored in an electronic form at our sole discretion for the Purposes mentioned here under.

However, the Provider of Information shall not be covered by this Privacy Policy, if he/she accesses any other/ third party links from the website.

By visiting our website and using the Services as provided by us (either through the website, vide our various Internet based and other applications or through the physical means) including but not limited to subscribing, sending of inquiries etc., you expressly agree to this Privacy Policy. Further, by accessing the website and/or utilising the Services provided by us (both through online/electronic or vide physical/offline means) you shall be treated as expressly giving your consent for the processing, retention and utilisation of the Personal Information for the Purposes stated herein in accordance with this Privacy Policy and the terms hereof

### **PERSONAL INFORMATION**

The personal information that we collect from you, includes personal information and other such information that is confidential in nature, and shall mean and include any information that relates to a person, that is either directly or indirectly, in combination with other information that is available or likely to be available to us, is capable of identifying the Provider of the Information (“Personal Information”)

The Personal Information collected from you and covered under this Privacy Policy shall include the following, relating to:

- Full name;
- Address;
- Telephone / mobile number(s);
- Gender;
- E-mail address;
- Password (in the event of you signing up for the online facilities);
- any number, code, or other identifier, including Aadhaar number, Permanent Account Number assigned to the Provider of Information under any legislation and/or laws made by Parliament or any State Legislature which may be used for the purpose of verifying the identity of the Provider of Information;
- Financial information (pertaining to the investments/ applications/ transactions and any other related purposes vide which we would be providing the Services to you);
- facial images, fingerprints, iris scans, or any other similar personal data resulting from measurements or technical processing operations carried out on physical physiological, or behavioural characteristics of Provider of Information, which allow or confirm the unique identification of the Provider of Information;
- Any other data relating to the Provider of Information who is directly or indirectly identifiable, by his/her characteristic, trait, attribute or any other feature of the identity of the Provider of Information, or any combination of such features, or any combination of such features with any other information;
- Any other information as defined under Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, as may be required by us from time to time in order to provide Services to the Provider of Information.
- any other category of data as specified under any legislation or laws passed by the Parliament or any State Legislature which may be required for the Purposes or for verifying the identity of the Provider of Information.

However, any information that is freely available in the public domain is exempt from the above definition.

We shall take reasonable steps to ensure that the Personal Information collected and processed by us shall not be distorted and/ or mutilated so that the Personal

Information is not presented in an incorrect or misleading manner. In the event, in the opinion of the Provider of Information, any information collected by the AMC is distorted and/or mutilated and the Personal Information is presented in an incorrect or misleading manner, then the Provider of Information may request, in writing, to modify, or correct such Personal Information, to the customer service department. Upon receipt of such request, AMC may, on a best efforts basis, may correct the Personal Information within 30 (thirty) days and shall inform the Provider of Information with confirmation of such correction. However, despite our best efforts, if any Personal Information shall be found misleading, inaccurate or incomplete, then, Bandhan Mutual Fund, Bandhan AMC Limited, Bandhan Mutual Fund Trustee Limited, IDFC India Equity Hedge Fund, directors, trustees, officers, employees or affiliates' shall not be held liable to you.

#### **COLLECTION OF PERSONAL INFORMATION:**

Personal Information is collected and/or obtained by us from several sources as stated herein below, wherein the Provider of Information has provided for the same. The information provided may include such Personal Information as a part of the application and/or enrolment process (the same maybe online or in a physical application form). Additionally, we may obtain the Personal Information from third-parties, or through call recordings at our call centres, internet technology, including our website.

Information may also be collected from vendors/ distributors and/or any other service providers for maintenance of our records and for processing of the payments/ commissions etc.

In the event, in the opinion of the Provider of Information, any information collected by the AMC or provided by the Provider of Information is incorrect, incomplete and false or requires to be updated, then the Provider of Information may request, in writing, to change, modify, alter, update or correct the Personal Information, alongwith supporting document, to the customer service department. Upon receipt of such request, AMC may, on a best efforts basis, change, modify or correct the Personal Information within 30 (thirty) days and shall inform the Provider of Information with confirmation of such correction.

The Provider of Information agrees and understands that the Personal Information collected by us shall be processed, stored and used by us, and the same may also be passed to, transmitted to and processed by our affiliates and other data processors, agents or service providers acting under a contract with us for the Purposes identified herein.

#### **USE OF PERSONAL INFORMATION (“Purposes”):**

You expressly agree and understand that:

1. AMC may use your Personal Information for the Purposes of providing you with the certain services to which you have subscribed (“Services”) and any services incidental to the Services such as processing instructions, responding to service requests, resolve any grievances. The same may also be used to contact you whenever required and also to seek your feedback in relation to the offered Services.
2. The Personal Information (like e-mail address, phone number, etc.) may be used to send periodic information on the Services or upcoming events or announcements and also to send various statutory reports and disclosures as required under SEBI (Mutual Funds) Regulations, 1996, SEBI (Portfolio Managers) Regulations, 2020, SEBI (Alternative Investment Funds) Regulations, 2012, SEBI Act, 1992, as amended from time to time.
3. The Personal Information may be used to generate statistics and reports for both internal use and for sharing with affiliates, intermediaries, successors, vendors, data processors, service providers, agents, representatives and advertisers. Such statistics and reports will not contain Personal Information that could identify the Provider of Information, personally.
4. The Services provided by us include investment management services.
5. Any change in the use of Personal Information shall be notified to the Provider of Information.

#### **WITHDRAWAL OF CONSENT:**

The Provider of Information shall at all times be entitled to withdraw the consent granted by it pursuant to this Privacy Policy and/ or any other documentation executed by it in relation to sharing of its Personal Information, by submitting a request, in writing stating his/her reasons for withdrawal of such consent to the customer service department. Upon receipt of such request, AMC may, on a best efforts basis, cease any further disclosure and usage of the Personal Information within 30 (thirty) days. However, all legal consequences for the effects of such withdrawal shall be borne by the Provider of Information.

Further, in the event, the Provider of Information desires to discontinue the Services or to restrict or prevent continuing disclosure of Personal Information, they shall submit a request, in writing, to the customer service department for such discontinuation. Subject to applicable laws in India, upon receipt of such request, AMC may, on a best efforts basis, cease any further disclosure of the Personal Information to any third party within 30 (thirty) days.

Notwithstanding anything contained herein, the Provider of Information shall have the right to access its Personal Information shared by them or as collected by the AMC, by

submitting a request, in writing, to access or receive confirmation of completion of the processing of their Personal Information, to the customer service department. Upon receipt of such request, AMC may, on a best efforts basis, provide a summary of the Personal Information or grant access to the Provider of Information within 30 (thirty) days. The Provider of Information shall further be entitled to share such Personal Information received by it to any third party. However, in the event, The Provider of Information shares such Personal Information received by him/her to any third party, Bandhan Mutual Fund, Bandhan AMC Limited, Bandhan Mutual Fund Trustee Limited, IDFC India Equity Hedge Fund, directors, trustees, officers, employees or affiliates' shall not be held liable to you.

#### **SECURITY STANDARDS AND MEASURES:**

We have adopted reasonable security practices and procedures and have implemented such reasonable security practices and safeguards which are appropriate to protect the integrity and the sensitivity of the Personal Information. These security practices and standards are consistent with the generally accepted standards of commercial business practice, which includes technical, operational and physical security control measures which commensurate with the Personal Information being protected from any misuse, unauthorised access, unauthorised processing, unauthorised storage, unauthorised modification or alteration, destruction and/or unauthorised disclosures while the same is with us.

The Provider of Information, especially the investors agree and understand that trusted third parties who act on our behalf for performing of certain functions such as processing of transactions, issuing account statements etc. are under contractual obligations to ensure reasonable security safeguards commensurate to the sensitivity of the Personal Information being handled by them.

Notwithstanding anything contained in this Privacy Policy, in the event, the Provider of Information discloses the Personal Information to any third party or fails to follow the security instructions provided, then any unauthorised breach of our security control measures or unauthorised disclosure of your Personal Information caused to you due to the website being hacked or any such breach of our security control measures shall be your sole responsibility and liability. Bandhan Mutual Fund, Bandhan AMC Limited, Bandhan Mutual Fund Trustee Limited, IDFC India Equity Hedge Fund, directors, trustees, officers, employees or affiliates' shall not be held liable to you.

#### **DISCLOSURE OF PERSONAL INFORMATION:**

Bandhan AMC Limited may disclose the Provider's information in order to:

- Enforce legal rights or claim, seeking any relief, defending any charge, opposing any claim, or obtaining any legal advice from an advocate in any impending legal proceeding;
- Conform to legal and/ or statutory requirements or comply with legal process;
- Protect and defend Bandhan AMC's or its Affiliates' rights, interests or property;
- Enforce our legal rights, terms and conditions or provisions of the offering documents of Schemes of the Mutual Fund/ Alternative Investment Fund/Portfolio Management Services or any other products or Services.

#### **SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES:**

To the extent required or permitted under law, we may share your Personal Information for the uses mentioned here with the following third parties:

- Registrar and transfer agent(s), call centres, bankers, custodians, depositories and/ or authorised external third parties who are involved in transaction processing, dispatches, etc., of your investment / transactions with us and/or who are vendors/ service providers/ distributors to whom commission / brokerage / remuneration is paid;
- Distributors or sub-brokers or intermediaries through whom applications are received and whose ARN number (if applicable for the concerned business) is stamped / printed/ written on the application form/ transaction request;
- Any other organisation for verifying the identity of investors / distributors for complying with anti-money laundering requirements;
- Any governmental authority including but not limited to the Reserve Bank of India and/ or the Securities and Exchange Board of India;
- Certain Personal Information may be shared with post office, local & international courier service providers and other intermediaries for correspondence with the Provider of Information and for making payments to the Provider by cheques, drafts, warrants, through electronic clearing services, NEFT etc.

We will, on a best effort basis, ensure that Personal Information is transferred to the third parties, on an assurance from them that reasonable and appropriate steps have been taken to maintain the required level of data protection.

The Personal Information so collected shall be communicated to third parties / third persons only for the reasons consistent with the Purposes for which such Personal Information was originally collected or such purposes as authorised by law.

#### **DIRECT MARKETING:**

Any, non-personally identifiable visitor information may be provided to the third parties for marketing, advertising, or other uses however Personal Information shall not be shared for direct marketing without your express permission. This will not be applicable to Alternative Investment Fund which is based on Private Placement either through the AMC or through the Distributor.

#### **RETENTION OF PERSONAL INFORMATION:**

Subject to withdrawal of consent for processing of the Personal Information, we may retain your Personal Information for as long as may be reasonably required to provide our Services to you or otherwise if required under law.

#### **BREACH OF INTERNET SECURITY:**

In addition to our efforts for the protection of the Personal Information, it is important that the Provider of Information should co-operate with us for the security of the Personal Information. It is recommended that the Provider of Information, especially the investors, should necessarily choose their passwords carefully such that no unauthorised access is made by any third party and not to disclose the same to any one and or keep a record of the same in writing.

However, despite our best efforts, if unauthorised persons breach our security control measures resulting in the website being hacked or presenting inaccurate information etc., Bandhan Mutual Fund, IDFC India Equity Hedge Fund, Bandhan AMC Limited, Bandhan Mutual Fund Trustee Limited, directors, trustees, officers, employees or affiliates' shall not be held liable.

#### **INCIDENTAL INFORMATION:**

When you visit our website/mobile application, we use cookies, which are small pieces of information that allow us to maintain your connection to our website/mobile application. The website/mobile application may use cookies for detecting what kind of device you have in order to present content in the best way, for a language switch and/or for other purposes. These cookies do not collect or store any Personal Information and the visitor including the Provider of Information can refuse the use of cookies

The website/mobile application and a web analytics service (which may be used by us) uses cookies to help the website/mobile application operators analyse how users use the website/mobile application. The information generated by the cookie about the visitors' use of the website/mobile application (including the IP address, browser-supplied information and site session information) will be transmitted to and stored as part of the normal operation of Services. Also, information may be supplied to the owners or operators of third party websites from which it is possible to link to our website with information relating the number of users linking to our website/mobile

application from such third party websites and/or third party applications. The information shared shall be non- personally identifiable information.

All such incidental information will be used only to assist us in providing an effective Service on the website.

#### **GRIEVANCE REDRESSAL:**

Any grievance relating to your Personal Information may be addressed to our Customer Service Department at the e-mail address given below which shall be resolved in less than 30 (thirty) days from the date of receipt of the grievances:

[investormf@bandhanamc.com](mailto:investormf@bandhanamc.com) (for Mutual Fund)

[Investor.services@bandhanamc.com](mailto:Investor.services@bandhanamc.com) (for AIF and PMS)

Where, a grievance is not resolved within the time period or where the Provider of Information is not satisfied with the manner in which the grievance is resolved, or the AMC has rejected the grievance raised, the Provider of Information shall have the right to file a complaint in the manner prescribed under the respective Act for concerned business activities.

This Privacy Policy is current, valid and up to date as per the laws, rules and regulations that have been enacted in this regard. This Privacy Policy may be updated or amended from time to time and the Providers of Information are advised to visit this page regularly in order to view the same.