

# 3P INVESTMENT MANAGERS PRIVATE LIMITED

## Data Protection Policy

Version- First

Policy Owner- Sharad Mohnot

Approved By- Board of Directors

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## **1. INTRODUCTION**

The objective of this Data Protection Policy is to inform you of how 3P INVESTMENT MANAGERS PRIVATE LIMITED (3PIM) 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 “3PIM”, “us”, “we” or “our”) manages Personal Data (as defined below). We ask 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 Statement supplements but does not supersede or replace any other consent you may have previously provided to 3PIM in respect of your Personal Data, and your consents herein are additional to any rights to which 3PIM 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 such Personal Data you may provide 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 us in any forms you may have submitted to us in taking steps to enter or entering into a contact to provide you with services. When we process such Personal Data 3PIM will rely on Contract as its lawful basis for processing.

We may also collect personal information about you from applications, forms or questionnaires you may complete or agreements you enter into with us or in the course of your establishing or maintaining a customer relationship with us, including information about your credit history or financial situation, and your transactions with us or others who provide services to us. Again, when processing such Personal Data 3PIM will be relying on Contract as its lawful basis for processing.

We may also collect personal information about you as a result of us recording certain telephone calls which our employees may have with you, and storing these recordings, in order to satisfy our legal and regulatory obligations or for 3PIM business purposes. Apart from Personal Data, we may collect other types of information which is not linked to a natural person, and which is anonymous. For example, the number of website visitors and the number of website users using a particular service. In this way, we hope to improve our customer services.

3PIM and its associates may fetch, receive, store, and capture Know Your Customer (KYC) information from the Central Vigilance Commission’s KRA Agency (CVL KRA) and the

Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI). The KYC information collected includes, but is not limited to, personal identification details, financial information, and relevant documents pertaining to investors and/or their related persons. This process will be conducted in strict adherence to the guidelines and circulars established by the Securities and Exchange Board of India (SEBI).

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

Generally, 3PIM collects, uses and discloses Personal Data for the following purposes:

- a. processing applications for account opening, account maintenance and operations relating to your account(s), including without limitation, processing your applications or requests for services and/or products, processing your transactions, operating and closing your account(s);
- b. providing services and/or products to you (including the services and products of external providers) from time to time and dealing with all matters relating to the services and products;
- c. administration and/or managing the relationship between us and / or your account;
- d. carrying out your instructions or responding to your enquiries or feedback;
- e. conducting identity and/or credit checks, and carrying out customer due diligence and other checks and screenings and ongoing monitoring that may be required under any applicable law, regulation or directive or internal policies and procedures of 3PIM (including but not limited to those designed to combat bribery and corrupt practices, money laundering, terrorist financing and financial crime);
- f. preventing, detecting and investigating fraud, misconduct or any unlawful activities, whether or not requested by any relevant governmental or regulatory authority, and analysing and managing commercial risks;
- g. complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any governmental, tax, law enforcement or other authorities (whether local or foreign);
- h. managing 3PIM 's infrastructure and business operations and complying with 3PIM 's policies and procedures that may be required by applicable laws and regulations including those relating to risk control, security, audit, finance and accounting, systems and business continuity;
- i. addressing or investigating any complaints, claims or disputes;

- j. developing new services and/or products and updating you on our products and services from time to time;
- k. unless you have indicated your preference to opt out, providing you with marketing, advertising and promotional information, materials and/or documents relating to banking, investment, credit and/or financial products and/or services that 3PIM may be selling, marketing, offering or promoting, whether such products or services exist now or are created in the future;
- l. carrying out research, planning and statistical analysis;
- m. organizing promotional events; and
- n. enforcing our legal and/or contractual rights against you including, but not limited to, recovering any and all amounts owed to us, (collectively, the “Purposes”)
- o. all other incidental and associated purposes relating to the above and any other purpose which a customer may from time to time agree.
- p. We will not lend or sell your information to third parties.

#### **4. CONSENT**

3PIM may also use this information to provide you with information about other services we offer that are similar to those that you have already engaged us to provide or enquired about or to provide information about 3PIM by way of newsletters or emails.

In such instances 3PIM will only do so where we have either received consent from you or we have assessed that there is a legitimate interest for us to send you the communication. When assessing legitimate interest, we will balance our interests with your rights and will only send communications where you would reasonably expect to hear from us. You may opt out of receiving this information when we collect details or at any time by contacting us using the contact details below.

If you do not wish for us to continue to use your Personal Data or the Personal Data provided by you to us for any of the Purposes at any time in the future, you must notify us in writing to withdraw your consent. Depending on the circumstances, your withdrawal of consent may result in 3PIM ’s inability to provide you with the services and/or products that we have been offering to you, and consequently, may result in the termination of your relationship and/or accounts with us.

Where the personal data protection laws of the relevant jurisdictions permit us to collect, use or disclose the Personal Data without your or the Relevant Person’s consent, such permission granted by law will continue to apply.

## **5. DISCLOSURE, SHARING AND TRANSFER OF PERSONAL DATA OVERSEAS**

Subject to the provisions of any applicable law, Personal Data may be disclosed or transferred to, shared with or kept by the following entities, wherever located, for any of the Purposes or for processing for any of the Purposes:

- a. any third-party service providers, including RTA, archival management service providers, those providing administrative, telecommunications, computer, financial intermediary, payment or securities clearing or other services to 3PIM in connection with the operation of its business;
- b. our professional advisers (including lawyers) and agents (including our executing brokers, clearing houses and settlement agents);
- c. our auditors;
- d. any person to whom disclosure is permitted or required by law or any court order;
- e. any local or foreign government agencies, regulatory authorities and statutory bodies having jurisdiction over us; and
- f. any of their respective successors and assigns.

To the extent that we may need to transfer personal data outside the relevant jurisdiction, we shall do so in accordance with the personal data protection law of that jurisdiction to ensure that we provide a standard of protection to the Personal Data so transferred that is comparable to the protection under that jurisdiction.

## **6. ACCURACY, ACCESS AND CORRECTION**

If you would like to obtain access to check for accuracy and make corrections to your Personal Data, you may contact us in writing at the address set out in Section 15 below referencing 'Data Protection Policy'. In exceptional circumstances, we reserve the right to deny you access to your Personal Data and may provide an explanation as required by applicable laws.

## **7. RETENTION & ERASURE**

3PIM are committed to only keeping your personal data for as long as we need to in order to fulfil the relevant purpose(s) it was collected for, as set out above in this notice, and for as long as we are required or permitted to keep it by law.

We shall cease to retain Personal Data or remove the means by which the Personal Data can be associated with particular individuals, as soon as it is reasonable to conclude that the purpose

for which that Personal Data was collected is no longer being served by retention of the Personal Data and retention is no longer necessary for legal or business purposes.

We may retain copies of our customer contracts in order to enable us to deal with any legal issues and the information provided to us for identification verification checks, financial crime and anti-money laundering checks (as required by law) for up to 8 years after termination or expiry of our contract with you. We may retain details of complaints for up to 8 years from the date of receipt.

We may keep records of the following for up to 8 years:

- electronic communications and minutes of face-to-face meetings;
- suitability and appropriateness assessments;
- periodic statements (for example, valuations); and
- all orders and transactions in financial instruments on your behalf (including information about your identity).

## **8. DATA SECURITY**

3PIM has taken and will continue to take reasonable efforts to protect Personal Data in our possession or control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

While we strive to protect your Personal Data, we cannot ensure the security of any Personal Data which you may have transmitted to us, via the Internet, and we urge you to take every precaution to protect your Personal Data and use a secure browser.

## **9. UPDATES TO THE DATA PROTECTION AND PRIVACY STATEMENT**

3PIM may from time to time update this Personal Data Protection Policy to ensure that it is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Such changes will be posted on our website.

Such changes to our Data Protection Policy shall apply from the time that we post the same on this website.

## **10. SUBJECT ACCESS REQUEST**

When we receive such a request, we will endeavour to provide you with these details without delay and at the latest within one month of receipt. We may extend the period of compliance by a further two months where requests are complex or numerous. In such instances 3PIM will inform you within one month of the receipt of the request and explain why the extension is necessary.

## **11. YOUR RIGHTS**

You also have the following rights (unless exemptions apply), which can be exercised by contacting us using the details provided below:

- To ask us not to process your personal data for marketing purposes;
- To prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- To be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- To lodge a complaint about the way in which your personal data is being used to your Data Protection Authority.

When you contact us to exercise any of the rights above, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity. If you would like to lodge a complaint or exercise any of your rights set out above, you can contact us at [services@3pim.in](mailto:services@3pim.in)

## **12. THIRD PARTY WEBSITES**

Our website may contain links to other websites. Please note that we are not responsible for the privacy practices of such other websites, and you are advised to read the privacy statement of each website you visit which may collect your Personal Data.

## **13. THIRD PARTY PERSONAL INFORMATION**

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Notice.

In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

## **14. CONTACTING US**

If you have any comments or questions about the collection, use or disclosure of your Personal Data or this Data Protection and Privacy Statement, please contact us in writing at the address below referencing 'Data Protection Policy':

3P Investment Managers Private Ltd.

Email: [services@3pim.in](mailto:services@3pim.in)