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## PRIVACY POLICY

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## 1. Introduction

A warm welcome to you from SBICAP Securities Limited. The domain name [www.sbismart.com](http://www.sbismart.com) is owned by SBICAP Securities Limited only.

The term "You" or "User" shall mean any natural or legitimate individual including online/offline customers/users and the terms "We", "Us", "Our" shall mean SBICAP Securities Limited.

We understand that our customers and website visitors are concerned about the privacy of information. We are dedicated to safeguard all the sensitive information that you share with us.

The policy sets forth various security practices and procedures that shall apply to the use and disclosure and sharing of sensitive personal data or information, Personally Identifiable Information ('PII') provided by the registered users of the website.

## 2. Collection of Information

We understand clearly that you and your Personal Information is one of our most valuable assets. We store and process your Information including any Personally Identifiable Information 'PII' collected, if any, on computers that may be protected by physical as well as reasonable technological security measures and procedures in accordance with regulatory authorities.

We acknowledge and accept that the personal details that you impart to us, is to be kept in strict confidentiality and to use the information only in the manner which would be beneficial to our customers. We consider our relationship with you as invaluable and strive to respect and safeguard your right to privacy. We shall protect the personal details received from you with the same degree of care, to prevent the unauthorized use, dissemination, or publication of these information as we protect our own confidential information of a like nature.

We shall use the personal information to improve our service to you and to keep you updated about our new product or information that may be of interest to you. The information collected from you would be used in the right spirit and context in which it is intended to be used.

## 3. What PII is collected from you?

Website would require registration, when registering or giving feedback on our site, you may be asked to enter your name, email address, phone number, feedback or other details to help you with your experience.

We collect IP addresses for site security and to better understand of how our visitors use our site so that we can improve our site and your experience.

In addition, we use small bits of data called cookies stored on user's computers to stimulate a continuous connection. Please visit our Cookies Policy for more details.

#### **4. Use and disclosure of Personal & Financial Information**

We would also impart your personal information wherever it is required to be disclosed under law to any of the governmental agency or regulatory authorities. By agreeing to avail the services offered by us, you have agreed to the collection and use of your Sensitive Personal Data or Information.

You have the right to refuse or withdraw your consent to share/dissemination of your Sensitive Personal Data or Information. However, in such an event, you would no longer avail the services offered by us.

Also, under certain situations, we may be required to share the information given by you with the third parties retailers, where we think that they can bestow to build on adding more value and upgrade the quality of services communicated by us to you. We shall take all appropriate steps to ensure that the confidentiality of your information is maintained by imposing strict privileged standards on all the third parties with whom we part this data with.

We will share your personal data within our group of companies and with authorised third parties. This is necessary to place, administer your investments and our business and employees and to check on your suitability for our products and services. Third parties that we may share your data with include:

- Lenders
- Regulators
- Sub consultants
- Other intermediaries

However, these parties would be required to use the information obtained from us for such purposes exclusively. We will endeavour to take all reasonable steps to ensure that the confidentiality of your information is maintained.

#### **5. For how long do we need your data**

We will only retain personal data for as long as necessary and as required by different Statutes, for the purposes for which it was gained and where we continue to have a lawful basis for doing so. If the personal data is no longer necessary, or where we no longer have the lawful basis for processing we may delete or fully anonymise the data.

The retaining of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests and marketing purposes. Sometimes we may need to retain your data for longer, for example if we are defending ourselves in a legal dispute or as required by law or where evidence exists that a future complaint may occur.

#### **6. Reasonable Security Practices for Protecting Information**

We use various types of technical safeguards in order to maintain the confidentiality and integrity of your personal information. Once we receive your transmission of information, we make commercially rational efforts to shield the security of our network.

For protection of your privacy and security, we take feasible measures to verify your identity before permitting you access to your account. The user shall be responsible for maintaining the secrecy of their entire account information.

## **7. Procedure to Safeguard Information**

Your personal information is stored in secured networks and only limited number of persons can access your personal information. These personnel are conferred special access rights and are required to keep the information confidential. All sensitive/credit information you provide is encrypted via Secure Socket Layer (SSL) technology.

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible. In order to ensure your PII is safe with us, we undertake a variety of security measures when you enter your transaction details, submit, or access your information.

To fortify security of access to the personal information and transaction details, the access to the secured zone of our website is restricted by the unique login ID and Password selected by you. You should be very cautious in handling the ID and password and you should ensure that you do not reveal it to anybody, nor do you keep it in writing.

## **8. Changes to the Privacy Policy**

From time to time, SBICAP Securities Limited may update or refurbish this privacy policy. If there are adjustments to the terms of this privacy policy, documents containing the revised policy on the website will be updated.

## **9. Disclaimer as to Loss**

Although, suitable steps are taken to maintain the security of Personal Information we gather from you. Under no circumstances shall SBICAP Securities Limited be liable to you or any other third parties for any loss or damage (including, without limitation, damage for loss of business or loss of profits) arising directly or indirectly from your use of or inability to use, this site or any of the material contained in it. SBICAP Securities Limited assumes no responsibility for any false, inaccurate, inappropriate or incomplete information presented on the website.

## **10. Non-Binding**

Please note that this privacy policy does not create any contractual or other legal rights in or on behalf of any party, nor is it intended to do so.

## **11. How to Contact us**

If you have any questions, please contact us by emailing to :  
helpdesk@sbicapsec.com