Dolat Capital Market Pvt. Ltd.

PRIVACY POLICY

1. Introduction

Dolat Capital Market Pvt. Ltd. ("DCMPL", "we", "us" or "our") respects the privacy of individuals who visit or use our website, products and services, and is committed to protecting personal information entrusted to us.

This Privacy Policy explains the manner in which DCMPL may collect, use, process, store, disclose and protect personal information relating to users, visitors, clients, prospective clients, investors, employees, service providers and other individuals interacting with us, through online or offline channels.

For the purposes of this Privacy Policy, "you", "your" or "User" means any natural person whose personal information is provided to or collected by DCMPL.

2. Information We May Collect

Depending on the nature of your interaction with DCMPL, we may collect information including:

- Name, contact details, postal address, email address and telephone/mobile number;
- PAN, KYC and identification details, including information obtained through authorised KYC Registration Agencies or other permitted sources;
- Bank account, Demat account and other financial or transaction-related information;
- Information relating to income, financial circumstances, investment profile and risk profile, where required for the relevant services;
- Login credentials, passwords, PINs or authentication information, where applicable;
- Information relating to transactions, investments, holdings, instructions and communications with us;
- Information contained in applications, forms, agreements, correspondence and other documents provided to us;

- Device, browser, IP address, website usage, session and technical information collected through electronic interactions; and
- Any other information that is reasonably required for providing our services or complying with applicable legal and regulatory requirements.

We seek to collect only such personal information as is reasonably necessary for the relevant purpose and as may be required under applicable law.

3. Purpose of Collection and Use

Personal information may be collected and processed for purposes including:

- Providing, administering and improving our products and services;
- Processing applications, instructions, transactions and settlements;
- Completing KYC, client onboarding, verification and due diligence;
- Maintaining client, investor and transaction records;
- Communicating with users regarding services, transactions, announcements and relevant information;
- Fulfilling contractual, legal, regulatory, audit, accounting and reporting obligations;
- Preventing, detecting and investigating fraud, misuse, unauthorised access and other unlawful activities;
- Maintaining and improving the security and functionality of our website, systems and services;
- Generating internal statistics, reports and analytics;
- Protecting and enforcing the rights, interests and property of DCMPL and its clients; and
- Any other purpose permitted or required under applicable law.

Where consent is required as the basis for processing, DCMPL shall obtain and process personal information in accordance with applicable law.

4. Sharing and Disclosure of Personal Information

DCMPL may disclose or share personal information, to the extent necessary and permitted under applicable law, with:

- SEBI, stock exchanges, depositories, regulators, governmental authorities, judicial authorities and other statutory or regulatory bodies;
- Banks, custodians, depositories, registrars and transfer agents and other entities involved in processing transactions or providing regulated services;
- Brokers, distributors, intermediaries, authorised representatives and other entities engaged in providing or facilitating relevant services;
- Technology, cloud, IT, cybersecurity, communication, document management, payment, courier and other service providers engaged by DCMPL;
- Auditors, legal advisers, professional advisers and other consultants, where required for legitimate business, legal or regulatory purposes;
- DCMPL's group companies or associated entities, where such sharing is necessary for legitimate business, service, operational, compliance or regulatory purposes and is permitted under applicable law; and
- Any other person or entity where disclosure is required or permitted by applicable law or pursuant to a lawful request or direction.

DCMPL does not intend to sell or commercially trade personal information of its users.

Personal information shall be shared only to the extent reasonably necessary for the relevant purpose and subject to applicable legal, contractual and security requirements.

5. Third-Party Service Providers

DCMPL may engage third-party service providers to support its operations and provide services to users. Such service providers may process personal information on behalf of DCMPL for specified and legitimate purposes.

DCMPL expects such service providers to maintain appropriate safeguards for the protection of personal information and to process such information only in accordance with applicable requirements and their engagement with DCMPL.

6. Cookies and Technical Information

DCMPL's website may use cookies, web technologies or similar technical mechanisms to support website functionality, security, performance and user experience.

The website may also automatically record certain technical information, including IP addresses, browser information, device information, operating system, session information and website usage information, for purposes such as security monitoring, analytics, troubleshooting and improving website functionality.

You may be able to manage or disable cookies through your browser settings; however, certain website functionalities may be affected as a result.

7. Information Provided About Other Individuals

If you provide personal information relating to another individual, you should ensure that you are authorised to provide such information and that the individual has been appropriately informed, where required under applicable law, about the collection and use of their personal information.

8. Data Security

DCMPL maintains reasonable technical, organisational and security measures appropriate to the nature of the personal information processed by it, with the objective of protecting such information against unauthorised access, misuse, alteration, disclosure, loss or destruction.

However, no method of transmission or storage over the internet or electronic systems can be guaranteed to be completely secure. Accordingly, while DCMPL takes reasonable measures to protect personal information, it cannot guarantee absolute security of information transmitted electronically.

In the event of a personal data breach, DCMPL shall take such measures as may be required under applicable law.

9. Data Retention

DCMPL shall retain personal information for such period as may be reasonably necessary to fulfil the purposes for which it was collected, provide the relevant services, comply with contractual, legal, regulatory, accounting, audit or reporting requirements, resolve disputes and enforce applicable rights.

Upon expiry of the applicable retention period, personal information may be deleted, anonymised or otherwise disposed of in accordance with applicable law and DCMPL's internal policies.

10. Accuracy of Information

Users are expected to provide information that is accurate, complete and up to date and to inform DCMPL of any material changes where necessary for providing services or maintaining regulatory and statutory records.

DCMPL may rely on information provided by users, subject to applicable verification and regulatory requirements.

11. Rights and Requests Relating to Personal Information

Subject to applicable law and the nature of the processing, individuals may have rights in relation to their personal information, including rights relating to access, correction, updating, withdrawal of consent, grievance redressal and other rights prescribed under applicable law.

Requests relating to personal information may be submitted to DCMPL through the contact details specified in the **Grievance Redressal** section below.

Where processing is based on consent, withdrawal of consent may be requested; however, withdrawal shall not affect the lawfulness of processing carried out before such withdrawal and may not affect processing that DCMPL is required or permitted to undertake under applicable law.

12. Grievance Redressal

Any privacy-related concern, request for correction or update of personal information, or grievance relating to the handling of personal information may be addressed to the designated grievance/contact person of DCMPL through the contact details published on the DCMPL website or otherwise communicated to the relevant user.

Grievance Contact:
Dolat Capital Market Pvt. Ltd. (Broking Division)
Email: dolatcapgrievance@dolatcapital.com
Contact No.: 9819842062
Address: A wing 1201 Naman Midtown, Senapati Bapat Marg, Mumbai

Dolat Capital Market Pvt. Ltd. (Asset Management)
Email: grievances.pms@dolatcapital.com
Contact No.: 8976864290
Address: A wing 1201 Naman Midtown, Senapati Bapat Marg, Mumbai

DCMPL shall endeavour to address privacy-related grievances and requests within the timelines prescribed under applicable law.

13. Third-Party Websites and Links

The DCMPL website may contain links to third-party websites, platforms or services. Such third-party websites are governed by their own privacy policies and terms.

DCMPL does not control or assume responsibility for the privacy practices, security or content of third-party websites. Users are advised to review the applicable privacy policies before providing personal information to such third parties.

14. Cross-Border Transfer

Where personal information is transferred, stored or processed outside India, DCMPL shall undertake such transfer or processing in accordance with applicable law and any requirements or restrictions prescribed by the relevant regulatory or governmental authorities.

15. Information Relating to Minors

DCMPL does not knowingly seek to collect personal information from children except where such collection is permitted and undertaken in accordance with applicable law and necessary for the relevant service or purpose.

Where applicable, DCMPL shall comply with requirements relating to verifiable parental or lawful guardian consent and processing of children's personal data.

16. Changes to this Privacy Policy

DCMPL may modify, update or amend this Privacy Policy from time to time to reflect changes in its practices, services, technology or applicable legal and regulatory requirements.

Any updated version shall be published on the DCMPL website and shall become effective from the date specified therein or, where no date is specified, upon publication.

Users are advised to review this Privacy Policy periodically for any changes.

17. Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws of India, subject to applicable statutory and regulatory requirements.

Any dispute arising in relation to this Privacy Policy or the use of the DCMPL website shall be subject to the jurisdiction of the competent courts at Mumbai, India, to the extent permitted by applicable law.