



# **DATA PRIVACY POLICY**

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Information Security Steering Committee (ISSC)
ISMS Core Team
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All users at Edelweiss

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## 1 Purpose

Edelweiss Financial Services Limited and its subsidiaries, associates, and group entities in India and overseas (collectively referred to as 'Edelweiss') are committed to the confidentiality, privacy, security and protection of Personal Information (as defined below) collected from/ disclosed by/ shared by Data Subjects (as defined below) including its employees (at all levels and grades, whether regular, fixed-term contract or temporary), contractors, vendors, associates, consultants, customers and business partners of Edelweiss.

This Privacy Policy (hereinafter referred to as 'Policy') broadly outlines the security practices and procedures adopted by Edelweiss for collection, receipt, possession, storage, dealing, handling, processing and protection of Personal Data (as defined below) and Sensitive Personal Data (as defined below) ('Personal Data' and 'Sensitive Personal Data' are hereinafter collectively referred to as 'Personal Information') of the Data Subjects, in compliance with applicable laws and regulations.

Business entities within Edelweiss may adopt this policy and put in place processes and procedures for internal controls as required or prescribed by their respective regulator.

## 2 Scope

This Policy is applicable to (i) all Data Subjects who provide, disclose, and share Personal Information to/ with Edelweiss, (ii) Data Processors (as defined below) working with or for Edelweiss, and who have or may have access to or receive Personal Information from Edelweiss and who have access to Personal Information collected or processed by Edelweiss; and (iii) Employees of Edelweiss who have access to Personal Information collected or processed by or on behalf of Edelweiss.

The Data Subjects, the Employees of Edelweiss and the Data Processors are expected to read, understand and comply with the Policy.

This Policy applies to all information that Edelweiss Financial Services Limited and all its group entities collectively referred to as Edelweiss collects, uses, process, stores, shares and dispose your personally identifiable information from the access made to websites, products & services.

## 3 Applicable Laws, Rules and Regulations

Edelweiss' obligations in connection with data protection presently emanate from:

- The Information Technology Act, 2000;
- The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

It shall be Edelweiss' endeavor to ensure that the Policy is updated/modified to comply with any:

- Data Protection laws as may be enacted in India and made applicable from time to time;
- Any other applicable laws, rules, regulations, enactments introduced from time to time.

## 4 Definitions

- Data Subject: means a natural person to whom the Personal Information relates to.
- Data Fiduciary: means an entity that alone or together with others determines the purpose and means of processing of Personal Information.

- **Data Processor:** means a person or entity who processes data on behalf of a Data Fiduciary and does not include an employee of Edelweiss.
- **Data Controller:** means a person that determines the purposes and means for processing personally identifiable information (PII) other than natural persons who use data for personal purposes.
- **Processing:** means the collection, storage, dealing or handling of Personal Information. The terms “process”, “processes” shall be construed accordingly.
- **Personal Data:** means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.
- **Personal Information:** means Personal Data and Sensitive Personal Data collectively.
- **Privacy Protection Controls (PPC)** means controls implemented in addition to the SPCs and may comprise of legal, contractual and any mandatory requirements.
- **Security and Prevention Controls (SPC)** means administrative, technical, procedural and physical safeguards to protect the Personal Information and in order to control, detect, prevent and correct from un-intended or accidental misuse.
- **Sensitive Personal Data:** means such personal information of a natural person which consists of information relating to: password; financial information such as bank account or credit card or debit card or other payment instrument details; physical, physiological and mental health condition; sexual orientation; intersex status/transgender status; medical records and history; genetic or Biometric information; caste or tribe; religious or political belief or affiliation; any detail relating to the above clauses as provided to body corporate for providing service; and any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise. Provided 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 Data.

## 5 Data Protection Officer

- The Data Protection Officer of Edelweiss is responsible for overseeing the compliance with this Policy. In accordance with The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Data Protection Officer is designated as the Grievance Officer to redress the grievances of the Data Subjects, within the regulatory/prescribed timelines. If a Data Subject has any questions about this Policy or concerns about how Edelweiss manages his/her Personal Information or if a Data Subject becomes aware of any breach of Personal Information, he/she may contact/notify the Data Protection Officer at the following contact details:

<b>Name</b>	Shailaja Adhurthi
<b>Address</b>	Edelweiss House, Off C S T Road, Kalina, Mumbai 400098
<b>Email ID</b>	DataProtectionOffice@edelweissfin.com

## 6 Collection, Use, Storing, Sharing and Processing of Personal Information

- As a rule, Edelweiss will collect Personal Information from the Data Subjects for specific, explicit, contractual, regulatory and legitimate purposes as required and in accordance with Applicable Laws, Rules and Regulations.
- Edelweiss may also gather the Data Subjects' Personal Information from third parties in accordance with Applicable Laws, Rules and Regulations. For instance, if the Data Subject is a potential candidate for employment with Edelweiss, Edelweiss may have received the Data Subject's Personal Information from third parties such as recruiters or external websites. Edelweiss shall apply the terms of this Policy to any Personal Information received from a third party. Edelweiss is not responsible for third parties' dissemination of a Data Subject's Personal Information.
- Edelweiss may combine the Personal Information a Data Subject provides with other information so as to provide and improve its services.
- Edelweiss shall use and process the Data Subject's Personal Information for a lawful purpose to meet the needs/performance of its business/legal obligations, in accordance with Applicable Laws, Rules and Regulations. Such processing of Data Subject's Personal Information will be adequate, relevant and limited to what is necessary and compatible in relation to the purposes for which it is collected.
- Edelweiss will not share information with any third party outside its organization, other than as necessary to fulfill any statutory or contractual requirements.

### 6.1 Privacy protection statement and commitment

- Edelweiss is committed to privacy. The information Edelweiss has about customers and users is protected and secure and Edelweiss works diligently to ensure that preferences regarding the use of your information are honored.
- This Policy explains the types of personal information Edelweiss collect and use, store, protect and disclose that information.
- Edelweiss build a privacy that works for everyone. Protecting our users' privacy and security is a responsibility that comes with creating products and services that are made available for all. Edelweiss look to these principles to guide our products, our processes, our people in keeping our users' data private, safe, secure and are committed to continually improve the level of protection it requires.

### 6.2 Consent for collection, use and processing of Personal Information

- By using Edelweiss' services and/or otherwise interacting with Edelweiss, the Data Subject consents to Edelweiss collecting, processing and disclosing Personal Information in accordance with this Policy. The Data Subject will, for the services rendered by Edelweiss, share/provide/disclose to Edelweiss only such Personal Information that is sought by Edelweiss pursuant to Applicable Laws, Rules and Regulations.
- Where required by Applicable Laws, Rules and Regulations, Edelweiss will not knowingly collect Personal Information from children/minors without insisting that they seek prior parental consent.
- Where Data Subject does not accept and agree with this Policy, the Data Subject must stop using Edelweiss' services immediately and write to the Data Protection Officer of Edelweiss withdrawing his consent.

### 6.3 Data Subjects’ rights and the obligations

The Data Subject can exercise all or any of the applicable privacy rights:

- Right of access - Access your data
- Right to withdraw consent - Withdraw your consent
- Right to object - Object to the processing of your data
- Right to rectification - Correct your data
- Right to erasure - Have your data deleted
- Right to data portability - Transfer your data
- Right to restriction of processing - Restrict processing
- Automated individual decision-making - Be protected from Automated Decision Making
- Right to lodge a complaint - Complain to DPO and Data Protection Authority as maybe applicable

### 6.4 What security and privacy protection does Edelweiss apply

- **Security and Prevention Controls (SPC)** means administrative, technical, procedural and physical safeguards to protect the Personal Information and in order to control, detect, prevent and correct from un-intended or accidental misuse.
- As technology evolves, Edelweiss’s privacy controls will evolve as well, ensuring that privacy is always an individual choice that belongs to the user.

Types of current Security and Prevention Controls (SPCs)	Types of current Privacy Protection Controls (PPCs)
<ul style="list-style-type: none"> <li>• SPCs examples stated herein are indicative and not exhaustive. Updates will automatically happen as a matter of course as and when received;</li> <li>• Management control covering policies, procedures, standards, benchmarks and guidelines</li> <li>• Authentication and Authorization control</li> <li>• Information classification and identification</li> <li>• Protection from malware</li> <li>• Software updates and patching</li> <li>• System hardening</li> <li>• Network protection and access control</li> <li>• Periodic user awareness, education and training</li> <li>• Cryptography</li> <li>• Activity monitoring</li> <li>• Secure deletion process</li> </ul>	<ul style="list-style-type: none"> <li>• PPCs examples stated herein are indicative and not exhaustive. Updates will happen as a matter of course as and when received</li> <li>• PII inventory maintenance</li> <li>• User notice and consent</li> <li>• Documenting the need and purpose</li> <li>• Articulating Privacy Principles and practicing within every process privacy by-design and by- default</li> <li>• Allowing privacy rights to be exercised</li> <li>• Notices and consents</li> <li>• Accountability, Audit, and Risk Management</li> <li>• Governance and Privacy Program</li> <li>• Personally identifiable data classification</li> <li>• Data Privacy Impact Assessment</li> <li>• Privacy Requirements for our service providers, consultants and contractors</li> </ul>

Types of current Security and Prevention Controls (SPCs)	Types of current Privacy Protection Controls (PPCs)
<ul style="list-style-type: none"> <li>• Data Protection Arrangement</li> <li>• Information security incident handling and reporting procedure</li> </ul>	<ul style="list-style-type: none"> <li>• Privacy Monitoring and Auditing</li> <li>• Periodic privacy awareness, education and training</li> <li>• Data Privacy Breach handling and reporting procedure</li> <li>• Privacy Enhanced System Design and Development</li> <li>• Privacy information retention and periodic destruction</li> </ul>

## 6.5 Disclosure of Personal Information

Edelweiss may share the Personal Information of the Data Subjects with third parties, in a variety of ways, including, as the following:

- **Agents acting on behalf of Edelweiss:** Edelweiss may share Personal Information about its Data Subjects with service providers or agents in order to have them perform on Edelweiss' behalf any of the activities Edelweiss is permitted to conduct under this Policy, Applicable Laws, Rules and Regulations and other applicable contractual terms. This includes things like designing or operating features, helping Edelweiss research and test feature improvements, identifying offers or personalized recommendations, performing analytics and marketing its services. These third parties are acting on behalf of Edelweiss so while they may have access to Personal Information they are required to follow Edelweiss' instructions and meet the standards explained in this Policy when handling information about a Data Subject that Edelweiss provide them.
- **As Part of a Corporate Change:** Edelweiss may disclose and transfer information about Data Subjects to a third party as part of, or in preparation for, capital raising, change of control, restructuring, corporate change, or sale or transfer of assets. For instance, Edelweiss may allow a potential acquirer or merger partner to review its databases, although it would restrict their use and disclosure of this data during the diligence phase.
- **For Legal Reasons:** Edelweiss reserves the right to transfer or disclose information about Data Subjects to third parties for certain legal purposes as required by law enforcement, government officials, or other third parties pursuant to a court order, or other legal process or when it believes, in its sole discretion, that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of legal agreements or organizational policies; to enforce its terms and conditions, to protect the security or integrity of its services;
- **With Data Subject's Consent:** There may also be other limited contexts in which Edelweiss shares specific types of Personal Information with the express consent of Data Subjects.
- Edelweiss would like to clarify that it does not sell/share the Personal Information of Data Subjects to/with third parties without an explicit contract.



## **6.6 Consent for Processing and Transfer of Personal Information**

Given that Edelweiss is an organization having an international presence as well as the digital nature of Personal Information, there may be a likelihood of the Personal Information collected by Edelweiss from the Data Subjects being transferred to and stored at, a destination outside India, subject to such laws as maybe applicable from time to time, including for the purposes of processing. By submitting Personal Information, the Data Subject agrees to this kind of storing, processing and transferring of the Personal information. However, the Data Subject will appreciate that Edelweiss is inclined towards the safety of its Personal Information and therefore, it takes all reasonable steps to ensure that such Personal information is treated securely and in accordance with this Policy and Applicable Law, Rules and Regulations. Moreover, it is clarified that whenever Edelweiss shares data, it relies on lawful measures to transfer such data.

## **6.7 Aggregated or Anonymized Data**

Edelweiss may combine a Data Subject's Personal Information with those of other users of its services and share or provide this trend information in aggregated and anonymized form with third parties, such as prospective investors, affiliates, partners and advertisers. This will only be anonymized data, and will never be capable of personally identifying an individual, and, will only be shared in accordance with Applicable Laws, Rules and Regulations. For example, Edelweiss may anonymize a Data Subject's Personal Information and use it in aggregated form in order to report on industry, marketing and employment trends.

## **7 Protection and Security of Personal Information**

Edelweiss shall protect the Personal Information received from the Data Subjects with the same degree of care, but no less than a reasonable degree of care, to prevent the unauthorized use, dissemination or publication of the information as it protects its own confidential information of a like nature. Edelweiss shall maintain physical, technical and procedural safeguards that are appropriate to protect the Data Subjects' Personal Information from loss, unauthorized access, copying, use, modification or disclosure. Edelweiss has appropriate policies and technical and organizational measures in place to safeguard and protect the Data Subjects' Personal Information against unlawful or unauthorized access, accidental loss or destruction, damage, unlawful or unauthorized use and disclosure. Edelweiss will also take all reasonable precautions to ensure that its staff and employees who have access to Personal Information about the Data Subjects have received adequate training.

## **8 Retention and Disposal of Personal Information**

Edelweiss endeavors to retain the Personal Information only for as long as it is necessary to fulfill the purpose for which the same was collected. The Personal Information will be kept in a manner which permits identification for as long as it is necessary for the purposes for which the relevant Personal Information is processed and as required by the Applicable Laws, Rules and Regulations. Edelweiss has the right to retain the Personal Information for legal and regulatory purpose and/or as per applicable data protection laws.

Personal Information may be stored for longer periods where the Personal Information is being processed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes or other purposes permitted under Applicable Laws, Rules and Regulations subject to implementation of the appropriate technical and organizational measures.

## **9 Accuracy of Personal Information**

Edelweiss does its best to ensure that the Personal Information it holds and uses is accurate. Edelweiss relies on the Data Subjects to disclose to it all relevant information and to inform of any changes thereto.

## 10 Access/Review of Personal Information

A Data Subject is entitled to request details of his/her Personal Information that Edelweiss holds. If a Data Subject wants to review, modify, verify, correct, restrict, seek deletion, seek erasure of any of the Personal Information, the Data Subject may contact the Data Protection Officer using the contact details provided herein. If any Personal Information happens to change during the course of employment/contract period/business arrangement, the Data Subject is requested to keep Edelweiss informed of the same.

## 11 Breach of Personal Information

Edelweiss takes appropriate steps to maintain the security of Personal Information collected from Data Subjects. If a security breach occurs, Edelweiss will promptly take steps to address the breach. If a security breach causes an unauthorized intrusion in the Edelweiss system that materially affects a Data Subject, Edelweiss will endeavor to notify the concerned Data Subject as soon as possible and where necessary or required by Applicable Laws, Rules and Regulations, report the actions taken in response to any breach.

Disclaimer: In such an event however, Edelweiss assumes no responsibility of whatsoever nature, for making good the losses and damages that a Data Subject may incur.

## 12 Review of the Policy

This Policy is subject to modifications as per changes in Applicable Laws, Rules and Regulations changes within Edelweiss's operating environment or on recommendations of the internal/external auditors.

Edelweiss reserves the right to modify this Policy at any time, without notice to Data Subject/(s).

The Data Protection Officer will review the compliance of this Policy and the processes thereunder on an annual basis to ensure continuous monitoring through the implementation of compliance measurements and review processes in accordance with the Applicable Laws, Rules and Regulations. If there are any material changes in the way Edelweiss treats a Data Subject's Personal Information, Edelweiss will place a prominent notice on its websites before the change goes into effect.

Edelweiss will regularly review the Policy and may make changes, as maybe required, to this Policy from time-to-time.

**BY ACCEPTING THIS PRIVACY POLICY, YOU AS THE DATA SUBJECT, EXPRESSLY CONSENT TO EDELWEISS COLLECTING, RECEIVING, POSSESSING, STORING, DEALING, HANDLING, PROCESSING, DISTRIBUTING AND PROTECTING YOUR PERSONAL INFORMATION IN THE MANNER PRESCRIBED HEREIN.**

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