

## **Privacy Policy**

We, Wealth Managers (India) Pvt Ltd. ("**Wealth Managers**", "**We**", "**Company**") are the owners of the following websites [www.wealthmanagersindia.com](http://www.wealthmanagersindia.com), <https://mfbo.wealthmanagersindia.com:8081/>, and <https://wmvault.wealthmanagersindia.com/> collectively referred to as "**Websites**" and individually referred as "**Website**". The Websites showcases our offerings. Wealth Managers provide services related to portfolio management, mutual fund distribution, and investment advisory ("**Services**").

We respect data privacy rights and are committed to protecting the personal information collected on these Websites. This privacy policy ("**Privacy Policy**") sets forth *how we collect, use and protect the personal information* collected on these Websites.

**PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY CONTINUING TO USE THESE WEBSITES, PROVIDING US PERSONAL INFORMATION, YOU CONSENT TO OUR USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU MAY WITHDRAW YOUR CONSENT OR ALTERNATIVELY CHOOSE NOT TO PROVIDE YOUR PERSONAL INFORMATION ON THE WEBSITES. SUCH AN INTIMATION TO WITHDRAW YOUR CONSENT CAN BE PROVIDED BY EMAIL TO COMMUNICATION DETAILS MENTIONED BELOW.**

**IF YOU ARE ACCESSING THE WEBSITES ON BEHALF OF A THIRD PARTY, YOU REPRESENT THAT YOU HAVE THE AUTHORITY TO BIND SUCH THIRD-PARTY TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND, IN SUCH AN EVENT YOUR USE OF THE WEBSITES SHALL REFER TO USE BY SUCH THIRD PARTY. IF YOU DO NOT HAVE SUCH AN AUTHORITY (TO PROVIDE ANY PERSONAL INFORMATION OF A THIRD PARTY) OR DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY, THEN YOU SHOULD REFRAIN FROM USING THE WEBSITES.**

**This Privacy Policy is an electronic record in the form of an electronic contract being compliant and construed in accordance with The Indian Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 under The Information Technology Act 2000 ("Privacy Rules") that require publishing of privacy policy for the collection, use, storage and transfer of sensitive personal data.**

### **1. Definitions**

- i. "**User(s)**", "**you**", "**your**" shall mean individuals that avail the Services through the Websites.
  
- ii. "**Visitor**" shall mean individuals who visit the Websites or may opt to share Personal Information to reach out to us.

- iii. **“User Content”** means all data and materials provided by the User in connection with the Services, including, without limitation information related to investible surplus, product option or other applicable information if any.

## 2. Personal Information Collected

For purposes of this Privacy Policy, “Personal Information” means information that can be used to personally identify the User, including but not limited to the User’s name, mobile number and email address.

- i. **Personal Information collected on the Websites-** To get in touch with us through the contact us section, on our Websites, book a consultation or apply for a job with us, or to avail our Services, Users & Visitors are required to provide their Personal Information depending on the category of Users & reason henceforth for accessing the website. The Personal Information collected on the Websites are as follow:
  - a. **www.wealthmanagersindia.com** – We collect the following Personal Information of Users & Visitors including but not limited to name, email address and mobile number visiting our Website and using the Services.
  - b. **<https://mfbo.wealthmanagersindia.com:8081/>** - This Website is accessed by Users who are our external clients. This website is a sub-domain of our primary Website.
  - c. **<https://wmvault.wealthmanagersindia.com/>** - This Website is accessed by Users and is hosted on azure cloud. This Website collects Personal Information and keep records of User’s documents like Pan Card, Aadhaar card, Driving License, Election ID card, Global Entity Identification Number, NREGA job card, Passport & Tan Number. This website is a sub-domain of our primary Website.
- ii. **Personal Information collected to provide the Services-**To avail the Services, User is required to complete the registration/subscription formalities. After completion of such formalities, including its validation and approval by Company, at its sole discretion, Company shall create an account for the User (“**User Account**”). During the registration process, and for availing the services, User shall be required to share/upload certain Personal Information as requested.
- iii. **Social Media Platforms** - If you wish to subscribe to our blog, contact us through social media platforms such as LinkedIn, Facebook, Twitter etc. (“**Social Media**”), we may get access to your Personal Information on such Social Media (such as your name, email id, and phone).
- iv. **Log Data** - When you visit the Websites directly or through third party websites, whether you have signed-in or are just browsing the Website, our servers automatically record information that your browser sends whenever you visit a website (“**Log Data**”). This Log Data may include information such as your computer’s Internet Protocol (“**IP**”) address, browser type or the webpage you were visiting before you came to any of our Websites, pages of our Websites and Subscription that you visit use, the time spent on those pages, information you search for on our Websites, access times and dates, and other product performance and analytical data.

## 3. COOKIES

Cookies are alphanumeric files which are placed on to your device when you visit a website. It allows us to recognize your device and store some information about your preferences or past actions, analyze trends, to learn about our user base, operate and improve our services and provide you with a better experience when you visit our websites.

#### 4. Accuracy of information

User undertakes that he shall be solely responsible for the accuracy, correctness, or truthfulness of the Personal Information shared with us whether of its own or any third party. In the event the User is sharing any Personal Information on behalf of a third person, the User represents and warrants that he has the necessary authority to share such Personal Information with the Company, obtained a written consent from such third party and the Company shall not be responsible for verifying the same. The User understands and acknowledges that such Personal Information shall be subject to the terms and conditions of this Privacy Policy.

#### 5. Use of Personal Information

We use the Personal Information for the following purposes:

- (i) to inform you about our Services and to respond to your requests;
- (ii) for creation or development of business intelligence or data analytics in relation to the Services provided by us
- (iii) to provide you with a better experience when you access our Websites and to improve the Services;
- (iv) to maintain and manage our Websites;
- (v) to manage our relationship with you;
- (vi) for internal record keeping; and to comply with our legal or statutory obligations.

#### 6. Disclosures

We do not sell, rent, share, distribute, lease or otherwise provide your Personal Information to third parties, without your prior consent. Keeping this in mind, we may disclose your Personal Information in the following cases:

- (i) **Affiliates:** We may provide your Personal Information to our affiliates to enable them to improve the Offerings, provide feedback and respond to their queries.
- (ii) **Service Providers:** We may share your Personal Information with the service providers who work with us in connection with operating the Websites and/ or providing the Offerings. All such service providers are subject to stringent confidentiality restrictions consistent with this Privacy Policy.
- (iii) **Merger or Acquisition:** We may transfer your Personal Information if we are acquired by another entity, or if we merge with another company or transfer a part of our business, including the Websites, to a third party. Any such third party or resultant entity that receives your Personal Information shall have the right to continue to use your Personal Information

in line with the purposes set out herein. In the event of such a sale or transfer, we may notify you.

- (iv) **Legal and Regulatory Authorities:** We may disclose your Personal Information in order to comply with our legal obligations/ court orders/ requests by Govt. authorities.

## **7. Data Retention**

We will retain User's Personal Information as long as it is required to be retained for the purpose of provision of the Services. We may also retain and use User's Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **8. Security**

Your Personal Information is stored on third party public cloud infrastructure. Although we provide appropriate firewalls and protections, we cannot warrant the security of Personal Information transmitted as these systems are not hack proof. Data pilferage due to unauthorized hacking, virus attacks, technical issues is possible, and we will take necessary measures to mitigate such events.

## **9. Your Rights**

You have the right to access Personal Information in our possession, right to have us rectify or modify any such Personal Information, right to have us erase/delete your Personal Information, right to restrict us from processing such Personal Information, right to object to our use of Personal Information, withdraw consent at any time where we are relying on consent to process Personal Information. Depending on the nature of the request, we may ask you to complete a Personal Information request form or seek certain details to verify the request. All requests for Personal Information will be handled within a reasonable period of time. If you would like to exercise ANY of these rights, please contact [ved@wealthmanagers.co.in](mailto:ved@wealthmanagers.co.in)

## **10. Choice and Opt-Out**

We may send you communications including but not limited to (a) notices about your use of our Websites and Services, including those concerning violations of use, (b) updates, (c) promotional information regarding our Services, and (d) newsletters. You may opt out of receiving promotional emails and newsletters from us by following the unsubscribe instructions provided in those emails. Alternatively, you can opt out, at any time, by emailing [ved@wealthmanagers.co.in](mailto:ved@wealthmanagers.co.in) with your specific request.

## **11. Links to other Websites**

Our Websites may contain links to other websites/applications of your interest. Please note that we do not have any control over such other websites/applications, and you will be accessing these websites/applications at your own risk. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites/applications and those are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to such websites/applications.

## **12. Limitation of liability**

To the extent permissible under the law, we shall not be liable for any direct, indirect, incidental, special, consequential, or exemplary damages, including but not limited to, damages for loss of profits,

goodwill, data, information, or other intangible losses (even if we have been advised of the possibility of such damages), arising out of this Privacy Policy.

### **13. Governing laws**

This Privacy Policy shall in all respects be governed by and construed and enforced in accordance with the laws of Pune and the courts of Pune shall have an exclusive jurisdiction to adjudicate any subject matter under this Privacy Policy.

### **14. CHANGES TO THIS POLICY**

Please revisit this page periodically to stay aware of any changes to this Privacy Policy, which we may update from time to time. If we modify this Privacy Policy, we will make it available through the respective Websites and indicate the date of the latest revision. If such modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change via email or through our Website.

This Privacy Policy was last modified on July 26, 2022.

### **15. Contact us**

If you have any questions or concerns or grievances regarding this Privacy Policy, or wish to withdraw your consent in relation to the processing of your Personal Information you can reach out to our appointed grievance redressal officer Vedkumar Zirange via email at [ved@wealthmanagers.co.in](mailto:ved@wealthmanagers.co.in).