

PRIVACY POLICY

At 3P INVESTMENT MANAGERS PRIVATE LIMITED ("3PIM", "we" "us" "our", etc.), we recognize the importance of securing the Personal Data (as defined below) that we collect about our investors / clients and website users ("you", "your" etc.). 3PIM has established policies and procedures concerning the handling and dealing of your Personal Data that will help us to protect your privacy. This Privacy Policy (as amended from time to time) describes how we handle and deal in Personal Data that we may collect and retain ("Privacy Policy"). This Privacy Policy applies to all Personal Data collected and received for and on behalf of 3P INDIA EQUITY FUND / 3PIM including on www.3pim.in website ("Site"), through 3P INDIA EQUITY FUND /3PIM for investor education awareness and all Personal Data collected and/or received by us from you directly or through third parties, as detailed below. Please note that Personal Data collected by us in the physical form and through the Site, 3P INDIA EQUITY FUND /3PIM or any other sources may be converted and stored in an electronic form at our sole discretion for the purposes as mentioned hereinunder. This Privacy Policy shall be read with and is subject to the Disclaimers notified on the Site.

We use the Personal Data collected about you only as mentioned in this Privacy Policy. However please note that you are no longer covered by terms of this Privacy Policy, if you access other websites using links from our Site as these websites may have their own privacy policies and we do not accept any responsibility or liability for any such policies. Please check these policies, where available, before you submit any personal data to these websites. By entering this Site, accessing the 3PIM site or by providing Personal Data to us when using our products and services, while making any investments in the units of schemes of 3P India Equity Fund and /or availing the advisory services, portfolio management services or, subscribing to our other services, sending inquiries including for the purpose of investor education awareness, you expressly have deemed to have agreed to this Privacy Policy and you have given your consent for usage/processing the personal data in terms of this Privacy Policy.

Categories of Personal Data

An indicative list of the categories of personal data or information collected by us or our service providers ("Personal Data") is as under:

- Your name, and contact information such as your residential address, business/ office address, email address, telephone number, mobile number or fax number;
- Information relating to your identity including your date and place of birth, nationality, Permanent Account Number (PAN) Details and country of domicile and/or your nationality; etc.
- Information relating to your work (if self-employed, the nature of the self-employment);
- Financial information such as bank account details, (including information in relation to change in bank accounts), beneficiary account number, type of accounts held, bank statements;
- Payment instrument details at the time of submitting application at the time of investment or as proof for carrying out change of bank account;
- Generation and storing password (PIN) in encrypted form based on the request from the investor under the online mode of investment;
- Photographs and signature;
- Device data including computer and mobile device, browsing actions and patterns and online activity for collective analysis;

- Behavioural details as to how utilise our products, services, offers, etc.;
- Marital status, gender, occupation;
- Social Relationships details such as your father's name/spouse name, mother's name, anniversary date; and/or
- Details of your communications and transactions with us.

Collection of Personal Data

We may collect/ receive your Personal Data from several sources as under:

- You may provide Personal Data as part of the application or enrolment process for any of our products or services (whether in physically or electronically);
- When you use our services or products and/or during the course of transactions;
- Through your communications and interactions with us through emails;
- Through online interactions etc.
- When you make enquiries or engage with us or with any other person where we are involved for any other person in the transaction concerning you;
- When you use our Site and online services provided by us and visit our branches, offices; information publicly available about you including on your social media accounts and where it is appropriate for us to use it; and/or through investor education awareness program/ seminar and investor education awareness mobile application;
- We may also obtain Personal Data about you from third parties including through our distributors, service providers and/or agents.

The information being collected is the basis of our ability to provide you with good, qualitative, timely and efficient service, while also keeping the information and data provided totally secure and confidential.

Security Standards and Measures

We adopt reasonable security practices and procedures and will protect your Personal Data by reasonable security safeguards appropriate to the sensitivity of the Personal Data, consistent with generally accepted standards of commercial business practice, which includes, technical, operational, managerial and physical security controls in order to protect your Personal Data from unauthorized access, or disclosure while it is under our control.

You agree and understand that when we use trusted third parties to act on our behalf for performing certain functions such as processing transactions, issuing account statements, payment gateway services, customer services etc., contractual or other means are used to ensure reasonable security safeguards appropriate to the sensitivity of the Personal Data, consistent with generally accepted standards of commercial business practice.

Any account statement containing financial information pertaining to the investor, if it is to be sent over the internet to such investor, distributors or any other entity as indicated above will be sent through secured means of communication as indicated and consented by you.

Legal basis and Purposes of the processing of your Personal Data

The legal basis for obtaining, processing Personal Data about you will be for one or more of the following purposes:

- Processing of information which is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
- Processing is necessary because of a legal obligation that applies to us.
- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.
- processing may be required to meet our legitimate interests, for example, to understand how customers use our services and to develop new services, as well as improve the service we currently provide.
- Where we have your consent to do so.
- Processing is necessary to protect your “vital interests”.

Whom do we share your Personal Data with

For the purposes identified in this Privacy Policy, you agree and understand that your Personal Data shall be collected, processed, stored and used by us, and passed to, transmitted to and processed by third parties or external authorities as maybe, if found relevant and necessary in order to comply with the applicable laws of the land and/or to ensure smooth functioning of the activities as may be prescribed under applicable law, such as:

- Other data processors, agents or service providers acting under a contract with us.
- Attorneys, accountants, auditors and persons or entities that assess our compliance with industry standards;
- Registrar and transfer agent/s, call centres.
- Banks, custodians, depositories and/or authorized external third parties who are involved in transaction processing, despatches, etc.
- Distributors or sub-brokers through whom applications of investors are received for the investments, any other organization for verifying the identity of investors for complying with anti-money laundering requirements.
- With intermediaries, whose ARN stamp appears on the application forms / transaction slips.
- With third parties such as post office, local and international couriers and other intermediaries for correspondence with the investor and for making payments to the investor by cheques, drafts, warrants, through Electronic Clearing Services (ECS), NEFT etc.
- Statutory and regulatory bodies and authorities including but not limited to the Reserve Bank of India or the Securities and Exchange Board of India (including central and local government) and law enforcement authorities and entities or persons, to whom or before whom it is mandatory to disclose the Personal Data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals.

We enter into contractual agreements with non-affiliate third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information. Personal Data shall be communicated to third persons only for reasons consistent with the purposes for which the data were originally collected or other purposes authorized by law.

We permit only authorized employees to have access to Personal Data. We ensure to enter into suitable terms with third party service providers in order to provide client confidentiality and follow a non-disclosure and restricted disclosure policy.

By using our website or by agreeing to transact with us, you agree to the above sharing of information during your relationship with us.

We will not use or share, any Personal Data collected on this Site or in the physical scheme application form etc. with a third party for their direct marketing purposes without your express permission. If you have supplied your email address, contact number or postal address, we or our service providers may send you periodic messages with information on existing and new products and services or upcoming events. You can choose to stop receiving such periodic messages/emails at any time by unsubscribing to the communication.

Information Incidental to Website, Email and Electronic Communications

IP addresses, browser-supplied information and site session information (for example, the sequence of pages visited during a visit to the Service, the average time spent, information searched for, access times) may be recorded as part of the normal operation of the service for purposes of usage analysis and security monitoring. The amount of information recorded depends on the settings you have on your web browser; please refer to your browser if you want to learn about what information it sends.

Tracking cookies (both session and persistent) may be used to implement certain features. This will cause your browser to save certain information about your activities. Most browsers can disable tracking cookies at the user's option, but this may limit your use of certain services. Cookies, ensures that you do not need to re-enter your details every time you visit it. You can erase or choose to block this information from your computer if you want to.

All such incidental information will be used only to assist us in providing an effective service on this Site. We may from time to time supply this information to the owners or operators of third-party websites from which it is possible to link to our Site with information relating to the number of users linking to our Site from such third party websites. You will not be identified from this information.

Retention of Personal Data

We may retain your Personal Data or information for as long as required to provide you with services or otherwise if required under any law or establishment, exercise or defence of legal claims. We may retain your personal data or information (or until the consent is revoked), unless otherwise prescribed by applicable legal requirements and presuming that it is necessary for the purpose of storing and processing. However, if you have availed any services/products/facility from us, we shall have the right to continue processing your information till such investments are in existence.

Withdrawal of Consent

You may withdraw your consent at any time with effect for the future in writing. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. Upon receipt of such request, we may not be able to offer you any further services; however, your Personal Data/ Information will be retained by us as per the extant laws.

Right to Access

Notwithstanding anything contained herein, you shall have the right to access your Personal Information shared or as collected by the AMC, by submitting a request, in writing. Upon receipt of such request, 3PIM may, on a best-efforts basis, provide a summary of the Personal Information within 30 (thirty) days.

Breach of Internet Security

You must ensure that any information or data being provided to us or by you or any person acting on our behalf should be rechecked. In case if any of the data/information is found to be inaccurate or incorrect, you shall be required to intimate us of the same for immediate amendment. 3PIM and any person acting on its behalf shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by you.

Further, despite our best efforts, if unauthorized persons breach our security control measures resulting in the Site being hacked or presenting inaccurate information etc., 3P India Equity Fund, 3P Investment Managers Private Limited, their directors, officers, employees or affiliate's will not be responsible.

Grievance Redressal

Any grievances relating to your Personal Data may be addressed to our client services team/Chief Compliance Officer at the email address given below:

NAME	CONTACT DETAILS	EMAIL
Ms. Dhvani Vaghela	+91-(22) 69544416	dhwaniv@3pim.in
Ms. Ketki Barot	+91-(22) 69544417	ketkib@3pim.in