

Privacy Policy

1. INTRODUCTION

RIGHT ALPHA CAPITAL PRIVATE LIMITED (ERSTWHILE KNOWN AS MATDEV INVESTMENT ADVISERS PRIVATE LIMITED), a company incorporated under the provisions of Companies Act 2013 holding a valid certificate of registration under the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013, (hereinafter referred to as “the SEBI Investment Adviser Regulations”) to carry on the business of investment advisory services, bearing the registration no. INA200015592 dated June 13, 2023 (“Right Alpha”, “Investment Adviser”, “Company”, “We” or “Us”).

We welcome “You” as our “Client(s)” or “Investor” availing our advisory services (“Services”) and appreciate your interest in our Services. This Privacy Policy (“Policy”) describes how We collect, receive, store, possess, deal, handle, process, share, use, disclose and protect Client Information that may directly or indirectly, identify You or related to You during and after your relationship with Us. In order to provide You our Services, you are required to grant your consent to this Policy. **All capitalized terms not defined in this Policy shall have the meaning ascribed to it in the Investment Advisory Agreement (“Agreement”) executed between You and the Company.**

2. THE DATA WE COLLECT ABOUT YOU

2.1 Right Alpha may collect, receive, store, possess, deal, handle, process, share, use, disclose and protect different categories of Personal Data¹, Non-Personal Data and Sensitive Personal Data Information² (“SPDI”), or such similar data known by any other term under the Applicable Laws, about You. Such Client Information (which shall include Personal Data, SPDI, and Non-Personal Data and more specifically the data or information as defined below) is only collected and processed with your consent or in performance of our contract with You, unless otherwise required or permitted under the Applicable Laws. The kind of data about You which we have grouped together as follows:

- 2.1.1. **Identity Data:** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nominee details and gender;
- 2.1.2. **Contact Data:** includes proof of address, billing address, delivery address, email address and telephone/mobile numbers;
- 2.1.3. **Financial Data:** includes bank account details, your demat account number, mutual fund folio number/folio details, list of extant assets and liabilities and/or payment instrument details;
- 2.1.4. **Transaction Data:** includes details from You and other details of Services You have availed from Us or currently held by You;
- 2.1.5. **Technical Data:** means internet protocol (IP) address if You browse our website, browser plug-in types and versions, operating system and platform and other technology on the devices You use to access our website and avail our Services;
- 2.1.6. **Usage Data:** includes information about how You use our website, products and Services;
- 2.1.7. **Profile Data:** means your interests, preferences, feedback, survey responses and all data (including Personal Data) contained in your user profile under your account and which may contain data populated by You.

¹Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, Rule 2, “*Personal Information is defined as “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.”*”

² Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, Rule 3, “*Sensitive personal data or information of a person is described as “such personal information which consists of information relating to;— (i) password; (ii) financial information such as Bank account or credit card or debit card or other payment instrument details ; (iii) physical, physiological and mental health condition; (iv) sexual orientation; (v) medical records and history; (vi) Biometric information; (vii) any detail relating to the above clauses as provided to body corporate for providing service; and (viii) 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 or information for the purposes of these rules”.*”

2.1.8. **Marketing and Communications Data:** shall include your preferences in receiving marketing from Us along with your communication preferences.

Personal Information does not include data where the identity has been removed (i.e. Anonymous Data). Right Alpha also collects, receives, stores, possess, deals, handles, process, shares, uses, discloses and protects aggregated data (eg. statistical or demographic data) which is non-personal information, for example, aggregated or anonymized information about Clients and other information that does not identify any individual (i.e. Anonymous Data), aggregated data, and the data which is not Personal Data, or Personal Information or SPDI, is referred to as “Non Personal Data”.

3. HOW WE COLLECT CLIENT INFORMATION

3.1 We receive a limited amount of Client Information via. lead generation programs. However, for provisioning of Services and for the purposes as set forth in this Policy, You will have to share with Us your Identity Data, Contact Data and Financial Data by filling in forms or by corresponding with Us by post, phone, email or otherwise.

3.2 We may procure Device IDs and IP addresses while interacting with Clients and third parties that constitute your Non-Personal Information. We also collect Non-Personal Information through service providers who process Client Information to help Us assess Client behaviour and use the same in accordance to the intent described hereunder.

3.3 We may also receive Transaction Data from Registrar & Transfer agent (“RTA”) and related information through Financial Partners.

4. HOW WE USE CLIENT INFORMATION. Most commonly, We will use your Client Information in any of the following circumstances:

4.1 Where We need to perform Services.

4.2 Where it is necessary for Us (or third parties described in Section 5) towards performance of contract and any such interests which require protection of Client Information.

4.3 Where We need to comply with a legal or regulatory obligation, or otherwise as required or permitted under Applicable Laws.

5. PROCESSING CLIENT INFORMATION

PURPOSE/ACTIVITY	TYPE OF PERSONAL DATA OR CLIENT INFORMATION	HOW WE DEAL, HANDLE & PROCESS CLIENT INFORMATION
To process and deliver Services including on-boarding new Clients and undertaking e-KYC through KRA. Clients will be required to submit certain information as described under Know Your Customer Application Form (“e-KYC Form”) along with their Permanent Account Number (“PAN”) and <i>Aadhaar</i> number as part of the onboarding process.	(a) Identity Data (b) Contact Data	<ul style="list-style-type: none"> - Performance of a contract with You: Information collected shall include, but not be limited to <i>Aadhaar information, photograph and canceled cheque leaf</i> amongst other documents which may be necessary for satisfactory verification of Client (“KYC Information”). - Legal Compliance: For verification of your identity and your address to ensure compliance with Applicable Laws.

To facilitate our internal contract governance purposes.		
To provide access to more information about our Services to You.	(a) Identity Data (b) Contact Data (c) Profile Data	- Performance of a contract with You. - Legal Compliance. - To enable data privacy and security policy controls, combat fraud or other unauthorized activity using our Services, track usage of the Services, and to study how Clients use our Services.
To collect and share Client Information with your Financial Partners. our operations team will share Client Information for initiating Services through PMSs, AMCs, AIFs towards supporting in setting up your designated accounts and facilitating the processing of your instructions which You may initiate via. your designated investment account (“Transaction Instructions”).	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Profile Data	- For facilitating Services to our Clients. - Financial institutions and/or entities request Personal Data for managing your portfolios. These entities may include portfolio managers (“PMS”), alternate investment funds (“AIFs”), asset management companies (“AMCs”) not affiliated with Investment Adviser, including, but not limited to Client's other professional advisors and/or certain service providers (i.e., attorney, accountant, broker-dealer, adviser, account custodian, record keeper, proxy management service provider, etc.) that may or may not have been recommended or engaged by Investment Adviser (“Financial Partners”). - Track the progress of transactions and address any resolution issues with Transactions Instructions with respective Financial Partners.
To deliver relevant recommendations to You about Services that may interest You and to measure or understand the effectiveness of our marketing plan in order to serve You better.	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data (f) Technical Data	- To study how Clients use our Services and improve customer experience, to provide You with information that may be of interest to You.
Asking You to provide a review or take a survey. This will help us improve our customer representation.	(a) Identity Data (b) Contact Data (c) Profile Data	- For getting feedback to improve our Services or understanding preferences in certain situations.
To comply with Applicable Laws, or for serving other purposes as permitted under Applicable Laws.	(a) Identity Data (b) Contact Data (c) Biometric Data (d) Technical Data (e) Usage Data (f) Profile Data	- Legal Compliance

- 5.1 **For Other Purposes:** We may use your Client Information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our products, Services, marketing and your customer experience.
- 5.2 **For Marketing and Communications.** We undertake marketing activities for updating Clients about prospective portfolios based on economic trends, as permissible under Applicable Laws towards your interest-based advertising. Clients at all times must ensure to use their own judgment to decide whether the information or service by our representatives or on any website is suitable for their needs. We may advertise and market our Services to You, including through interest-based advertising. We do not sell or lease Client Information to any third party.

6. HOW WE SHARE AND DISCLOSE USER INFORMATION

- 6.1 Right Alpha for the purposes of applicable data protection laws shall act as data fiduciary of the Client Information in connection with the Services. We may outsource certain parts or elements of the Services to our group companies and authorised third party service providers. All our service providers are predominantly located in India. Such service provider include:
- 6.1.1. **External Third Parties – Independent Financial Partners Acting As Data Fiduciaries.** We may interact with your Financial Partners for generating transaction reports while supporting You. Note that the use of Client Information by an authorized third party is subject to the respective party's privacy policy. Right Alpha will not be responsible for the privacy practices or the contents on the websites of such Financial Partners. Client(s) at all times must ensure to use their own judgment to decide whether the information or service by our representatives is suitable for their needs. We encourage You to read the privacy notices and policies of such Financial Partners before instructing Us to share any Client Information with them. We do not take responsibility for the terms of data usage as expressed on or through their platforms or their documentation.
- 6.1.2. **Service Providers -- Engaged For Processing Activities.** As described under this Policy, We share Client Information with KRA or any authorized service providers for verifying your Identity Data and Contact Data, either to check proof of address and/or to undertake activities relevant in the performance of Services including our legal, financial, accounting, and tax advisors.
- 6.2 **With Law enforcement / Legal obligation:** Under certain circumstances, Right Alpha may be required to disclose your Client Information without any prior permission, if such disclosure is required to be done under law or in response to valid requests by public authorities (e.g. a court or a law enforcement, regulatory or government agency) or to comply with a legal obligation.

7. SECURITY

- 7.1 Right Alpha has put in place procedures to deal with any suspected Client Information breach and may notify You and/or any applicable regulator of a breach where We are legally required to do so. We also reasonably endeavour to ensure:
- 7.1.1. the security and confidentiality of Client Information. We work to protect the security of your Personal Information during transmission by using appropriate software, which encrypts information You input. This encrypted information is stored on secure servers and data centres. Further, We ensure that the number of employees involved in the management of the data centre who have physical access to these storages and computers is limited. Also, We use advanced security technology to prevent our computers from being accessed by unauthorized persons.
- 7.1.2. Client Information is not accidentally lost, used or accessed in any unauthorized way, altered or disclosed by limiting access to Client Information to those employees, agents, contractors and other third parties who have a business need to know.
- 7.1.3. all service providers contractually commit to protect the security and confidentiality of Client Information processed on our behalf or on their server through services subscribed by Us.
- 7.1.4. Client Information is protected from any anticipated threats, hazards by applying reasonable industry standards towards security measures which include computer safeguards, secured files and buildings.

We may suspend your use of all or part of the Services without notice if We suspect or detect any breach of security.

8. **STORAGE.** We take all steps reasonably necessary to ensure that your data is stored towards rendering the Services, in accordance with Applicable Laws and disclosures under this Policy. We (a) may adequately mark or otherwise identify and physically and virtually segregate, all Client Information as Investment Adviser's property from other Client Information, and (b) may mask Client Information and store it away from other of our Confidential Information or the Confidential Information of other clients. Our storage compliance process also include:

8.1 **Retention:** We retain Client Information as long as We are providing the Services to You or for a period during which We reasonably anticipate providing the Services. Even after We stop providing Services directly to You and even if You close your Client account, We retain Client Information in order to comply with our legal and regulatory obligations. We may also retain it for fraud monitoring, detection and prevention activities. We also keep Client Information to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data under our contractual commitments to such financial partners as described under Section 5 above.

8.2 **Purging:** Unless preservation is required by law, We shall permanently purge any communication content (including but not limited to Client Information) obtained and stored by Us when no longer necessary for our purpose.

9. YOUR RIGHTS AND CHOICES

- 9.1 You have rights under data protection laws in relation to your Personal Information. Your rights may include the right to correct and update such information,
- 9.2 You have the right to opt-out of receiving marketing emails from Right Alpha at any time without cost by clicking on the relevant link contained in our marketing emails or by contacting Us. If You would prefer not to receive any of these communications, simply follow the unsubscribe instructions on the promotional email communications that You will receive should you wish to withdraw your consent or object to the processing, and;
- 9.3 You can also withdraw your consent to all or any of the Services at any time by writing to Us, Once We have received notification that You have withdrawn your consent, We will no longer process your information for the purpose or purposes You originally agreed to, unless We have another legal basis for doing so.

If You wish to exercise any of your available rights under the Applicable Laws, You may contact our privacy office at support@rightalphacapital.com. In particular, you may reach out to Us with questions or concerns relating to this Policy annexure; or, The client relationship, such as processing of Client Information towards the delivery of Services.

10. **ASSIGNMENT, CHANGE OF CONTROL AND TRANSFER.** In the event that We enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, We may share and/or transfer Client Information with third parties, and to the extent permitted, We may give You a written information of such an event.

11. **UPDATES TO OUR POLICY.** We may change and update this Policy from time to time. We will notify You of any material changes or additions to this Policy and may provide You with a copy of any amended Policy via. your registered e-mail ID.

12. **CONTACT US FOR GRIEVANCE REDRESSAL.** Clients are encouraged to discuss any changes in your contact information or any questions/issues regarding privacy policies and related procedures directly with:

Name: Gaurav Garg

Designation: Grievance Officer

Contact information: support@rightalphacapital.com

CLIENT CONSENT

By availing our Services, You hereby confirm that:

1. You have read the Policy herein above and that You provide Us with your consent to collect, receive, store, possess, deal, handle, process, share, use and disclose any Client Information for the purposes mentioned under this Policy and the Agreement. You hereby acknowledge that:
2. We will use Client Information for marketing and promotional activities compatible with the original purpose of this Agreement and Applicable Laws.

Signature of/for or on behalf of the

Client Date: __/ __/2023