



# **DATA PRIVACY POLICY**

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Information Security Management System Team (ISMS Team)	Compliance Team, Data Privacy Officer & IT Governance Head Head Governance Head (ISG)	Information Security Steering Committee (ISSC)

Amendment Log				
Version	Modification Date DD MMM YYYY	Section	A/M/D/R	Brief description of change
1.0	25 <sup>th</sup> April 2022	ALL	NIL	First Release
1.1	2 <sup>nd</sup> Nov 2022	All	A/M/R	Sec.5 Change in DPO name
2.0	10 <sup>th</sup> Feb 2023	All	R	Replace Personal Information to PII Added in sec 4.0 – Conditions for Data Processor and Data Controller Added is sec 7.0 Privacy Principles Changes done in sec 7.2 –Data privacy Policy statement and commitment Added sec 14 - PII de-identification Process Added note in section 1.0 – ISMS and PIMS is referred as ISPP

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2.1	19 <sup>th</sup> Feb 2024	All	M	Sec 3. Reference to DPDA added
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Distribution list
Chief Information Security Officer (CISO)
Data Privacy Officer (DPO)
Information Security Steering Committee (ISSC)
ISMS Core Team
Auditors (Internal & External)
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 PII (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 PII 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.

**Note:** Collectively ISMS and PIMS are referred as Information Security and Privacy Protection (ISPP)

## 2 Scope

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

The Data Subjects, Data Controller 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 collect, use, process, store, share and dispose personally identifiable information (PII) from the access made to websites, and provision of products & services.

## 3 Applicable Laws, Rules and Regulations

Edelweiss' obligations in connection with data privacy 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:

- Digital Personal Data Protection Act 2023;
- Any other applicable laws, rules, regulations, enactments introduced from time to time.

## 4 Conditions for Controller and/or Processor

Edelweiss will act as a Data Controller or Data Processor as required depending on the relationship including employer-employee relationship, use / subscription of products and services by customers, and contractual requirements.

Responsibilities of Edelweiss include

- Determination and documentation of the purpose and method of PII processing.
- Prior consent to be obtained and relevant records retained.
- Processing for lawful basis.
- Storage for defined period and disposal upon data retention life expiry according to internal policies and applicable law.
- Transfer in- such cases as maybe required including where it is legally mandated or upon Data Subject's consent using adequate and appropriate secure methods
- Will maintain a record of any data breaches in accordance with its internal data retention policy.

## 5 Definitions

- **Data Subject:** means a natural person to whom the PII relates to.
- **Data Fiduciary:** means an entity that alone or together with others determines the purpose and means of processing of PII.
- **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 PII other than natural persons who use data for personal purposes.
- **Processing:** means the collection, storage, dealing or handling of PII. 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.
- **PII or Personally Identifiable 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 PII and in order to control, detect, prevent and correct from unintended or accidental misuse.
- **Sensitive Personal Data:** means such PII 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.

## 6 Data Privacy Officer

- The Data Privacy 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 Privacy 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 PII or if a Data Subject becomes aware of any breach of PII, he/she may contact/notify the Data Privacy Officer at the following contact details:

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

## 7 Privacy Principles

### 7.1 Privacy protection statement and commitment

- As a rule, Edelweiss will collect PII from the Data Subjects for specific, explicit, contractual, regulatory and legitimate purposes as required and in accordance with Applicable Laws, Rules and Regulations.
- Edelweiss shall also gather the Data Subjects' PII 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 PII from third parties such as recruiters or external websites. Edelweiss shall apply the terms of this Policy to any PII received from a third party. Edelweiss is not responsible for third party's dissemination of a Data Subject's PII.
- Edelweiss shall combine the PII Data Subject provides with other information so as to provide and improve its services.
- Edelweiss shall use and process the Data Subject's PII 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 PII 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.

### 7.2 Data Privacy Policy Statement and Commitment

- Edelweiss is committed to protecting the PII of its customers, users and works diligently to ensure that preferences regarding the use of their PII stakeholders are honored.
- This Policy explains the types of PII Edelweiss collects and uses, stores, protects and disclose that information.
- Edelweiss Privacy Policy works for everyone. Protecting the 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 products, processes, people in keeping users’ data private, safe, secure and are committed to continually improve the level of protection required.

**7.3 Consent for collection, use and processing of PII**

- By using Edelweiss’ services and/or otherwise interacting with Edelweiss, the Data Subject consents to Edelweiss collecting, processing and disclosing PII in accordance with this Policy. The Data Subject will, for the services rendered by Edelweiss, share/provide/disclose to Edelweiss only such PII 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 PII 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 Privacy Officer of Edelweiss withdrawing his consent.

**7.4 Data Subjects’ rights and the obligations**

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

- Right of access
- Right to withdraw consent
- Right to object
- Right to rectification
- Right to erasure
- Right to data portability
- 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 Privacy Authority as maybe applicable

**7.5 What security and privacy protection does Edelweiss apply**

- **Security and Prevention Controls (SPC)** means administrative, technical, procedural and physical safeguards to protect the PII 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.

<b>Types of current Security and Prevention Controls (SPCs)</b>	<b>Types of current Privacy Protection Controls (PPCs)</b>
<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</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> </ul>



Types of current Security and Prevention Controls (SPCs)	Types of current Privacy Protection Controls (PPCs)
<p>guidelines</p> <ul style="list-style-type: none"> <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> <li>• Data Privacy Arrangement</li> <li>• Information security, incident handling, and reporting procedure</li> </ul>	<ul style="list-style-type: none"> <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> <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>

## 7.6 Disclosure of PII

Edelweiss may share the PII 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 PII 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 PII 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 PII 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 PII with the express consent of Data Subjects.
- Edelweiss would like to clarify that it does not sell/share the PII Data Subjects to/with third parties without an explicit contract.

### **7.7 Consent for Processing and Transfer of PII**

Given that Edelweiss is an organization having an international presence as well as the digital nature of PII, PII collected by Edelweiss from the Data Subjects being transferred to and stored at, a destination within India, subject to such laws as maybe applicable from time to time, including for the purposes of processing. By submitting PII, the Data Subject agrees to this kind of storing, processing and transferring of the PII. However, the Data Subject will appreciate that Edelweiss is inclined towards the safety of its PII and therefore, it takes all reasonable steps to ensure that such PII 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.

### **7.8 Aggregated or Anonymized Data**

Edelweiss may combine a Data Subject's PII 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 PII and use it in aggregated form in order to report on industry, marketing and employment trends.

## **8 Protection and Security of PII**

Edelweiss shall protect the PII 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' PII 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' PII 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 PII about the Data Subjects have received adequate training.

## **9 Retention and Disposal of PII**

Edelweiss endeavors to retain the PII only for as long as it is necessary to fulfill the purpose for which the same was collected. The PII will be kept in a manner which permits identification for as long as it is necessary for the purposes for which the relevant PII is processed and as required by the Applicable

Laws, Rules and Regulations. Edelweiss has the right to retain the PII for legal and regulatory purpose and/or as per applicable data privacy laws.

PII may be stored for longer periods where the PII 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.

## **10 Accuracy of PII**

Edelweiss does its best to ensure that the PII 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.

## **11 Access/Review of PII**

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

## **12 Breach of PII**

Edelweiss takes appropriate steps to maintain the security of PII 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.

## **13 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 Privacy 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 PII, 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.

## **14 PII-de-identification Process**

De-identification: "general term for any process of removing the association between a set identifying data and the Data Subject."

When data contains identifying information such as names, email addresses, geolocation information, or photographs, there can be a conflict between the goals of data use and privacy protection. De-identification/redaction/anonymization/pseudonymization attempt to resolve this conflict, allowing for PII that identifies individuals to be removed, while allowing other useful information to remain.

Edelweiss uses de-identification transformation to mask, delete, or otherwise obscure PII and the de-identification techniques can include any of the following:

- Masking sensitive data by partially or fully replacing characters with a symbol, such as an asterisk (\*) or hash (#).
- Replacing each instance of sensitive data with a token, or surrogate, string.
- Encrypting and replacing sensitive data using a randomly generated or pre-determined key.

**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 PII IN THE MANNER PRESCRIBED HEREIN.**

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