



Elixir Equities

AMFI Reg No:

ARN-1679



PaisaSmart

PaisaSmart Privacy Policy

Last updated date: 14/08/2024

“PaisaSmart”, “www.paisasmart.com” and “www.paisasmart.org” are properties owned by Elixir Equities Private Limited (“EEPL”). EEPL is a mutual fund distributor (ARN 1679) registered with AMFI, trading member and depository participant and is also engaged in providing other financial and related services. PaisaSmart is the operating brand name under which EEPL provides services related to Mutual Fund Distribution. PaisaSmart & EEPL shall hereinafter be referred to interchangeably and shall be interpreted to mean the same entity.

The security of personal information about you is our priority. We receive and store both personal and non-personal information about you when you visit and/or use our website, PaisaSmart.com or our iOS or Android mobile applications or our chatbot available through WhatsApp.

We protect this information by maintaining physical, electronic, and procedural safeguards that meet applicable laws. We train our employees in the proper handling of personal information. This Privacy Policy lays down the norms for that govern the use, disclosure and sharing of information about the users of PaisaSmart.

By using any of our services or providing us with your personal information for any other purpose, you agree to the terms of this Privacy Policy.

EEPL is governed by the provisions of applicable laws in India including the Information Technology Act, 2000, Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 and Digital Personal Data Protection Act, 2023 and such other rules/regulations (Collectively hereinafter referred to as "Applicable Laws(s)"), as amended from time to time, to maintain the privacy of your Personal Data. EEPL collects and processes your Personal Data only to the extent necessary for EEPL to process your requirement(s) in accordance with such Applicable Laws. In case you choose not to share your Personal Data as required with EEPL, EEPL may not be able to provide you with the services.

1. Information/Personal Data collected by PaisaSmart includes, but are not limited to, the following:
 - a. Personal details (e.g. name, contact details including, residential address, date of birth, documents such as identity card/passport details / Aadhaar details / PAN / Voter ID/driving license, and/or education details) provided by you to PaisaSmart to avail various services from PaisaSmart.
 - b. Your details including transaction history, balances and payment details, for effecting transfer of monies through various payment channels facilitated by PaisaSmart.



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- c. Financial details (e.g. income, expenses, net worth, and/or credit history) needed as part of the request for some of PaisaSmart's products/services.
 - d. Images/videos of documents/photos required to avail any of PaisaSmart's products/services.
 - e. Complete communication history with the PaisaSmart WhatsApp chatbot
 - f. Risk profile, investment selection, beneficiary and nominee data etc.
 - g. Employment details (e.g. occupation, employer name, positions held, employment history, salary and/or benefits, if any) as part of PaisaSmart's record retention for credit / various product evaluations or as required under applicable law including Prevention of Money Laundering (Maintenance of Records) Rules, 2005.
 - h. Specimen signature(s) or consent for the processing of your instructions received by PaisaSmart through PaisaSmart's various payment and delivery channels.
 - i. Timestamp including IP Address and Geolocation details of the system you use to access PaisaSmart's services.
 - j. Opinions provided by you to PaisaSmart by way of feedback or responses to surveys.
2. How We Use Your Data
- a. PaisaSmart utilizes both personal and non-personal information provided by you to deliver and improve our services, ensuring that each service offered is at your discretion and aligned with your needs, including but not limited to:
 - b. Facilitating Mutual Fund Transactions: Setting up your account and facilitating the processing of your transactions through our transaction partners. This includes maintaining records of your transactions and holdings, generating and sending reminders, alerts, and notifications for transactions.
 - c. KYC Updates and Verification: Registering or updating your KYC details in centralized databases such as NDML KRA and CERSAI (CKYC) to comply with regulatory requirements and to facilitate your transactions.
 - d. Service Support and Queries: Resolving any queries or concerns and providing support in case of issues with the use of our services or those provided by our partners.
 - e. Communications and Updates: Informing you about offers related to products and services, sharing marketing materials, and communicating updates about the progress and resolution of transactions or services availed.
 - f. Experience Enhancement: Streamlining and customizing your experience while using our mobile application, website, or chatbot, and employing non-personal and aggregated information to enhance service delivery.
 - g. Transactional Support and Analysis: Preparing analyses, reports, and tools such as portfolio snapshots, capital gains reports, and consolidated transaction history to assist in your financial decision-making.



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- h. Security and Compliance: Monitoring, identifying, resolving, and preventing security incidents, frauds, criminal activities, and ensuring compliance with applicable laws.
 - i. Research and Development: For research and development purposes to improve existing services and to design new offerings tailored to meet your financial needs.
 - j. Monitoring and Review: To monitor and review our services from time to time; Also, to undertake financial/regulatory / management reporting and create and maintain various risk management models; And, for conducting audits and for record-keeping purposes.
 - a. To fulfill the requirements of existing laws/regulations and/or court orders/ public orders/ regulatory directives received by PaisaSmart/ protect and defend the rights of users or PaisaSmart.
 - b. Any other matter incidental and associated to the above.
- 3. Sharing of Personal Data
 - a. PaisaSmart may share any Personal or Non-Personal data of users with the following parties, in connection with and as may be necessary for the conduct of PaisaSmart's business/operations.
 - b. With the Registrar & Transfer Agent's (RTA) of various Mutual Funds and/or other issuers, clearing corporations, exchanges, depositories, group companies, and associate entities to facilitate the services, banks, financial institutions, NBFCs and/or authorised external third parties/intermediaries, cloud services or any other service provider who are involved in transaction processing, dispatches, printing/marketing etc. while providing the service, unless any user will specifically write to PaisaSmart to refrain from sharing Personal Data with such parties.
 - c. With technology service providers like Cybrilla Technologies, Mindstack Technologies, OpenAI, and Amazon Web Services India Private Limited, as well as any other relevant technology providers as PaisaSmart may deem fit from time to time, to ensure efficient service delivery and technological advancement.
 - d. PaisaSmart also ensures that the parties to whom such aforesaid Personal Data is shared have confidentiality provisions and high levels of security practices, controls, and procedures to ensure its protection.
 - e. Notwithstanding anything contained, PaisaSmart shall not be responsible/liable, either directly or indirectly, for the authenticity/accuracy of the Personal Data submitted by you and/or for its misuse, not attributable to the acts of PaisaSmart, at any time and in any manner whatsoever.
- 4. Other Websites
 - a. PaisaSmart's website, mobile app and WhatsApp chatbot might contain links to other websites. Once you have left PaisaSmart services, you should check the applicable privacy policy of the third-party website to determine how they will



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handle the Personal Data they collect from you. PaisaSmart is not responsible for the privacy practices followed by such third parties or the content of such third-party websites.

5. Storage, Transmission & Security Practices

- a. Your information, including Personal Information, is transmitted between your device and our servers using HTTPS protocol for encryption. HTTPS is the technology used to create secure connections for your web browser and it's indicated by a padlock icon in Your browser. In addition to HTTPS, we make sure that Your Personal Information is always encrypted or hashed before we store it. We use industry standard encryption and hashing algorithms.
- b. Here's a draft clause on data communication through WhatsApp with an emphasis on the use of end-to-end encryption:
- c. PaisaSmart utilizes WhatsApp for secure communication with clients regarding services, notifications, and support. All communications through WhatsApp are secured with end-to-end encryption, ensuring that messages can only be read by the sender and the recipient. No third party, including WhatsApp or PaisaSmart, can access the contents of these encrypted messages.
- d. When you communicate with PaisaSmart via WhatsApp, you consent to the use of this platform and acknowledge that while end-to-end encryption is employed to protect the privacy and integrity of the exchange, you are also responsible for securing your device and your WhatsApp account. PaisaSmart is not liable for breaches that are attributable to compromised user devices or unauthorized access to your WhatsApp account.
- e. Please be aware that while PaisaSmart adheres to strict security protocols for communication via WhatsApp, it is your responsibility to ensure that any sensitive or personal information shared over the platform is done so under appropriate circumstances and with due consideration of privacy risks.
- f. PaisaSmart stores and processes your Personal Data only in India. PaisaSmart's data center and systems also maintain backup and disaster recovery systems in India. Information collected is stored on our servers, log files or storage systems owned by us or by third parties specifically providing such storage services.
- g. PaisaSmart takes various steps and measures to protect the security of your Personal Data from misuse, loss, unauthorized access, modification or disclosure. PaisaSmart uses the latest secured server layers encryption and access control on its systems. PaisaSmart safety and security processes are audited by a third-party cybersecurity audit agency from time to time.
- h. PaisaSmart has provided multiple levels of security to safeguard your app by the Login / Logout option. Please do not share your PaisaSmart login, password and OTP details with anybody.



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- i. PaisaSmart also ensures the device binding for the WhatsApp chatbot so that the same conversation cannot be initiated on different devices without any additional authentication / OTP.
 - j. However, PaisaSmart shall not be held responsible for any loss, damage or misuse of your Personal Data, if such loss, damage or misuse is attributable to a Force Majeure Event. A "Force Majeure Event" shall mean any event that is beyond the reasonable control of PaisaSmart and shall include, without limitation, sabotage, fire, flood, explosion, pandemic, epidemic, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, computer hacking, unauthorized access to computer data and storage device, computer crashes, breach of security and encryption, etc.
6. Your Rights in relation to Your Personal Data
 - a. You have the right to correct, amend, complete and update Personal Data for the processing of which has previously given consent. You represent that the Personal Data you provide from time to time is and shall be correct, current and updated and you have all the rights, permissions and consents to provide such Personal Data.
 - b. In addition to the rights detailed above, you may also have the right to revoke or withdraw your consent to the processing of your Personal Data. With this, PaisaSmart will no longer share your data with any of the parties involved in providing the services. However, PaisaSmart may retain your Personal Data if the purpose for its usage exists, after which the same is disposed of except for any record retention required by Applicable Laws.
 - c. If you wish to withdraw your consent given under this Policy for collection and use of any Personal Information, you can withdraw your Consent by sending us an email at mf.ops@elixirequities.com
 - d. PaisaSmart will facilitate your request to exercise such rights subject to the provisions of applicable laws relating to the processing and storage of Personal Data. If you wish to exercise any of the rights, please write an email, providing in as much detail as possible, the right(s) you wish to exercise.
7. Communications from PaisaSmart
 - a. PaisaSmart may from time to time contact you via calls, SMS, emails, and other communication channels to provide you with information pertaining to PaisaSmart's Services, notifications on updates vis-à-vis PaisaSmart Services (when PaisaSmart considers it necessary to do so), educational information and promotions.
8. Notify Us
 - a. If at any time you believe that PaisaSmart or its users/members have not adhered to these principles, please notify PaisaSmart by e-mail at mf.ops@elixirequities.com



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and PaisaSmart will use all commercially reasonable efforts to promptly notify you, determine and correct the problem.

9. Grievance Redressal

- a. If you have questions, concerns or grievances regarding Privacy Policy, you may address the same to mf.ops@elixirequities.com

10. Policy Review and Updates

- a. This policy will be reviewed by PaisaSmart as and when required and the same may change at any time.
- b. The latest and the most updated policy can always be found at PaisaSmart's website. While PaisaSmart will make reasonable efforts to keep you posted on any updates to this privacy policy, to make sure that you are aware of any changes, it is recommended that you review this policy periodically.
- c. This Privacy Policy shall apply uniformly to PaisaSmart's desktop website, mobile applications, WhatsApp chatbot and any services provisioned by PaisaSmart on its platform.