

## 1. Purpose and Scope

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 and privacy practices and procedures adopted by Edelweiss for collection, receipt, possession, storage, dealing, handling, processing and protection of Personal Data (as defined below) are hereinafter collectively referred to as PII of the Data Subjects, in compliance with applicable laws and regulations.

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.

## 2. 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.
- Digital Personal Data Protection Act 2023;
- Any other applicable laws, rules, regulations, enactments introduced from time to time.

## 3. Data subject's rights:

A Data Subject may request a report of the PII Edelweiss holds and can ask to review, correct, verify, delete, or erase that data by contacting the Data Privacy Officer using the provided details. The Data Subject must also inform Edelweiss of any changes to their personal information during employment, contract, or business relationships. In the event of the death or incapacity of the Data Principal, he/ she may nominate an individual who shall be entitled to exercise her rights on her behalf.

Rights provided by DPDP Act:

- Right to access information about personal data.
- Right to correction and erasure of personal data
- Right of grievance redressal.
- Right to nominate.

## 4. Edelweiss commits towards:

### • Collection of PII

Edelweiss collects data subjects' PII only for specific, explicit, contractual, regulatory, or other legitimate purposes, complying with all applicable laws. It may receive PII from third parties (e.g., recruiters or websites) under the same legal standards, though it is not liable for those parties' disclosures. The PII is combined with other data to deliver and improve services and is processed lawfully, adequately, relevantly, and solely to the extent necessary for business or legal obligations. Edelweiss does not share PII with external parties except when required to meet statutory or contractual requirements.

### • Data protection

Edelweiss is dedicated to safeguarding the personally identifiable information (PII) of its customers, users, and employees, and it actively honours their preferences on how that data is used. Its privacy policy applies universally, recognizing that protecting user privacy and security is an inherent responsibility of delivering products and services to all. Edelweiss ensures that data handling practices, technologies and personnel keep user data private, safe, and secure, and it commits to continuously enhancing its level of protection.

- **Processing and transfer of PII**

Edelweiss will not knowingly gather / process PII from children or minors without prior parental consent where required by law. In case the Data Principal does not agree with the policy and objects to the processing of PII required for legitimate purposes, they must immediately cease using Edelweiss' services and notify the Data Privacy Officer in writing to withdraw their consent.

Edelweiss may merge a Data principal's PII with that of other users, then share only the resulting aggregated, fully anonymized data with third parties such as investors, affiliates, partners, or advertisers. The anonymized data cannot identify any individual and is disclosed solely in compliance with applicable laws, rules, and regulations—for example, to report industry, marketing, or employment trends.

Additionally given that Edelweiss is an organization having an international presence by submitting PII, Data principals agree to storing, processing, and transferring of the PII to location other than India. Moreover, it is clarified that whenever Edelweiss shares data, it relies on lawful measures to transfer such data.

- **Disclosure of PII**

Edelweiss may share / disclose Data Subjects' PII only with vendors / data processors acting on its behalf for permitted activities (e.g., design, testing, analytics, marketing) under strict policy instructions; it may also disclose PII during corporate transactions (e.g., mergers, asset sales) with usage limits; it may reveal PII for legal reasons—such as law-enforcement requests, court orders, or to prevent harm, investigate wrongdoing, enforce agreements, or protect its services.

There may also be other limited contexts in which Edelweiss shares specific types of PII only with the explicit consent of Data principals. Edelweiss shall never sell or shares PII without a specific contractual agreement.

- **Protection and Security of PII**

Edelweiss shall protect Data principal's PII with the same reasonable care it applies to its own confidential information. It will maintain appropriate physical, technical and procedural safeguards to prevent loss, unauthorized access, copying, modification, use or disclosure. Edelweiss has policies and organizational measures that guard against unlawful access, accidental loss, destruction, damage, or misuse, and it ensures that any staff with PII access receive adequate training.

- **Retention and Disposal of PII**

Edelweiss retains a Data principal's PII only as long as needed to achieve the purpose for which it was collected and as required by applicable laws. The data remains identifiable for that duration; thereafter it is deleted or anonymized unless retention is required for legal, regulatory, archival, public-interest, scientific, historical, research or statistical reasons, in which case it is kept with appropriate technical and organizational safeguards.

- **Breach of PII**

Edelweiss implements appropriate safeguards to protect the PII it collects. In the event of a security breach, it will promptly remediate the incident and, if the breach results in a material unauthorized intrusion affecting a Data Principal, Edelweiss shall notify the affected individual as soon as possible and, report the remedial actions taken.

## **5. Details of DPO**

The Data Privacy Officer (DPO) oversees adherence to this Policy and, under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, serves as the Grievance Officer to resolve Data Subject complaints within the prescribed timelines. Any questions, concerns about PII handling, or reports of a breach should be directed to the DPO using the contact details provided.

Name Akshay Mulkutkar

Address Edelweiss House, Off C S T Road, Kalina, Mumbai 400098

Email ID [DataProtectionOffice@edelweissfin.com](mailto:DataProtectionOffice@edelweissfin.com)

**BY ACCEPTING THIS PRIVACY POLICY, YOU AS THE DATA PRINCIPLE, EXPRESSLY CONSENT TO EDELWEISS COLLECTING, RECEIVING, POSSESSING, STORING, DEALING, HANDLING, PROCESSING, DISTRIBUTING AND PROTECTING YOUR PII IN THE MANNER PRESCRIBED HEREIN.**