

PRIVACY COMMITMENT

SGROYAL CAPITAL PRIVATE LIMITED recognizes the expectations of its customers with regard to privacy, confidentiality and security of their personal information that resides with the Company. It is the policy of the Company to keep the personal information of customers secure and use the same solely for the activities related to the Company. The Company has adopted the privacy policy aimed at protecting the personal information provided by / disclosed by the customers ('Policy'). This Policy governs the way in which the Company collects, uses, discloses, stores, secures and disposes of personal information and sensitive personal data or information.

DEFINITIONS

“Personal information” (PI) 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 the Company, is capable of identifying such person.

“Sensitive personal data or information” (SPDI) of a person means such personal information 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;
- Biometric information;

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- Any detail relating to the above clauses as provided to body corporate for providing service;

Provided that, any information that is freely available or accessible in public domain or furnished under any extant law shall not be regarded as sensitive personal data or information for the purposes of this Policy.

APPLICABILITY OF THE POLICY

This Policy is applicable to the personal information and sensitive personal data or information collected by the company or its affiliates directly from the customer or through the Company's online portals, mobile apps and electronic communications as also any information collected by the Company's server from the customer's browser.

Purpose of Collection and Use of Personal Information / Sensitive Personal Data or

Information: The Company collects the PI and SPDI from its customers and uses the same for specific business purposes or for other related purposes designated by the Company or for a lawful purpose to comply with the applicable laws and regulations. The Company shall not divulge any personal information collected from the customer, for cross selling or any other purposes, without the written consent of the customer.

The authenticity of the personal information provided by the customer shall not be the responsibility of the Company.

The Company shall not be responsible for any information that is freely available or accessible in public domain or furnished as per law for the time being in force,

DISCLOSURE OF PERSONAL INFORMATION

The personal information collected by the Company shall not be disclosed to any other organization except:

Where the disclosure has been agreed in a written contract or otherwise between the Company and the customer;

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Where the Company is required to disclose the personal information to an affiliate / third party / service provider on a need-to-know basis, for providing services / related activities, provided that in such case the Company shall inform such affiliate / third party / service provider of the confidential nature of the personal information and shall keep the same standards of information/ data security as that of the Company.

To statutory and regulatory authorities on their specific request as per rules in force.

REASONABLE SECURITY PRACTICES AND PROCEDURE

The security of personal information is a priority and is protected by maintaining physical, electronic and procedural safeguards that meet applicable laws. The Company shall take reasonable steps and measures to protect the security of the customer's personal information from misuse and loss, un- authorized access, modification or disclosure. The Company maintains its security systems to ensure that the personal information of the customer is appropriately protected and follows the extant standard encryption norms followed for the transmission of information. The Company ensures that its employees and affiliates respect the confidentiality of any personal information held by the Company.

NOTICE OF CHANGE

The Company may, from time to time, change this, Policy.

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COOKIE POLICY

The Company's digital platforms may use various third-party analytical tools. These tools may use cookies which are downloaded to the customer's device when the customer visits a website in order to provide a personalized browsing experience. Cookies are used for other purposes like remembering the customer's preferences & settings, provide personalized browsing experience and analyze site operations. These cookies collect information about how users use a website. All information collected by third party cookies is aggregated and anonymous. By using the Company's website, the user agrees that these types of cookies can be placed on his/her device. User is free to disable/delete these cookies by changing his/her device / browser settings. The Company is not responsible for cookies placed in the device of user/s by any other website and information collected thereto.

Reporting Authority for any Breach in Data Privacy

SGROYAL CAPITAL PRIVATE LIMITED, being NBFC and in category of ND -NSI (Non – Deposit – Non – Systematic Important) needs to strict with its data policy and to adhere the same following Data Privacy Committee is formed and shall mandatorily will be the channel to address any such breach of action –

Name	Designation	Email id
Sitaram Mitharwal	Director	sitaram@sgroyalcapital.com sitaram86@gmail.com
Gopal Lal Gupta	Director	cagopallalgupta@gmail.com
Vipul Khatod	Compliance officer and Legal head	legal@sgroyalcapital@gmail.com

Any Complaint by the stakeholders or customers or any person associated with the company of the company can be addressed to the above-mentioned authorized person over the mentioned respective mail id and on receipt of such complaint, redressal of such

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compliant will be done by such method as may be decided by the Data Privacy Committee, Data Privacy Committee will ensure the disbursal of such compliant not later than 45 days of receipt of such complaint and shall submit the detailed report to the Board of Directors within additional 07 days.



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