

# Palette Wealth Management Private Limited

## PRIVACY POLICY

### Introduction and Purpose

The protection of personal data in India is presently governed by the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011. In addition, the Digital Personal Data Protection Act, 2023 has been enacted to establish a comprehensive framework for the collection, use, storage, and protection of digital personal data, and will come into effect once notified by the Government of India.

Palette Wealth Management Private Limited ("PWM") is committed to safeguarding your privacy. This Privacy Notice explains how we collect, use, and protect your personal data in compliance with applicable laws, and outlines the rights and choices available to you. Our objective is to provide you with transparency and confidence regarding the privacy and security of your personal information when you engage with us.

**Please read this Privacy Notice carefully. By visiting our website or using any of our services, you indicate your agreement to our use of your personal information as set out in this Privacy Notice.**

### Who is responsible for your personal data

PWM is responsible for your personal data. The PWM whose Registered Office is at the C Wing, 29 Floor, 2903, PL46, East Tower, NC Kelkar, Dadar, Shivaji Park, Mumbai - 400028, Maharashtra, India and Corporate Office is at The Business Quarter 536, 5th Floor, Tower 2A, North Annex, One World Centre, Lower Parel, Mumbai - 400013, Maharashtra, India and their affiliates and representatives ("PWM Entities"). Specifically, your data will be controlled by the PWM Entity that you have instructed or that is providing services or communication to you in your region.

### Information we collect about you

#### **When do we collect information?**

#### **We may collect personal data about you in a number of circumstances:**

- When you register with us (on website or mobile application), apply to use any of our services, become our client, or contact us in person, by telephone, by email or by post;
- When you provide feedback or complete a contact form on our website or Application.
- When you or your organisation offers to provide or provide services to us;

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## ***What information will we collect and why?***

### **We may collect the following information depending on the service provided:**

- Your contact details, such as your name, job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address;
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (i.e. National Insurance Number);
- Passport details, driving license and utility bills;
- Details of the services you request from us;
- Details of your visit to any of our offices or other visits to third party locations as may be organised depending upon the nature of services provided by us;
- In some circumstances, we collect personal data about you from a third-party source. For example, we may collect personal data from your organisation, other organisations with whom you have dealings, government agencies, a credit reporting agency, fraud prevention agencies, financial crime agencies, an information or service provider, all of which forms part of publicly available records, e.g. Companies House in the United Kingdom.
- Details of your employment status, income and source of wealth;
- IP address and browser-generated data when you visit our website or Application;
- From time to time, personal data about relating to health and details of dietary preferences when relevant to meetings or events to which we invite you.

### ***Other Sites***

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

### ***Are you required to provide us with personal data?***

As a general rule, you will provide us with personal data entirely voluntarily; there are generally no detrimental effects for you if you choose not to consent or to provide personal data. However, there are circumstances in which PWM cannot take action without certain of your personal data, for example such personal data is required to send you newsletters or to meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 and any other applicable legislation and for the purposes of crime prevention and fraud prevention before we can enter into any contractual obligations for provision of services.

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## ***How will we use your information?***

### **We use information provided by you in the following ways:**

- To process your application to use our services and to provide you with requested services;
- To undertake checks such as identification verification checks with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime prevention and fraud prevention to enable us to comply with our legal obligations (such as record keeping);
- To comply with our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To help protect your information and prevent unauthorised access to it;
- To deal with any queries, complaints or problems reported by you;
- To generate statistics relating to use of our website and Application, such as the popularity of certain features or services. We do not use personally identifiable information for these purposes;
- If required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or for the enforcement of any agreement between you and us;
- To notify you of changes to our services; and
- To help improve the services we provide to you.

We may also use this information to provide you with information about other services we offer that are similar to those that you have already engaged us to provide or enquired about or to provide information about PWM by way of newsletters or emails.

In such instances PWM will only do so where we have either received consent from you or we have assessed that there is a legitimate interest for us to send you the communication. When assessing legitimate interest, we will balance our interests with your rights and will only send communications where you would reasonably expect to hear from us. You may opt out of receiving this information when we collect details or at any time by contacting us on [compliance@palettewealth.com](mailto:compliance@palettewealth.com)

## ***How will we protect your information?***

We take appropriate security measures (including physical, electronic and procedural measures) to help protect the confidentiality, integrity and availability of your personal information from unauthorised access and disclosure.

## ***Who would we disclose your information to?***

### **We may disclose your information to:**

- Businesses that are legally part of the same group of companies within PWM, or that become part of that group;
- Our brokers, dealers, IT providers, services providers and agents in order to provide and maintain the provision of the services;

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- Our appointed auditors, accountants, lawyers and other professional advisers (e.g. compliance consultants), to the extent that they require access to the information in order to advise us;
- Fraud prevention agencies and other organisations to allow us to undertake the checks set out below. We will supply details of such agencies on request;
- We may also be required to share information with auditors appointed by the providers of such products or services;
- The regulators, the Financial Conduct Authority, or any relevant regulatory authority where they are entitled to require disclosure;
- Meet applicable law, the order of a Court or market rules and codes of practice applicable to the circumstances at the time;
- Investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable law;
- Relevant tax, payments and customs authority, who may pass this on to tax authorities in other jurisdictions. The tax regulations require us to collect information about each investor's tax residency;
- Prospective seller or buyer of such business or assets in the event that we sell or buy any business or assets, in which case we will disclose your personal information. If all PWM's assets are acquired by a third party, in which case personal information held by it about its clients may be one of the transferred assets.

## **We will not lend or sell your information to third parties.**

### **Personal data about other people which you provide to us**

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Notice. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

### **Data retention**

We are committed to only keeping your personal data for as long as we need to in order to fulfil the relevant purpose (s) it was collected for, as set out above in this notice, and for as long as we are required or permitted to keep it by law. We retain copies of our customer contracts in order to enable us to deal with any legal issues and the information provided to us for identification verification checks, financial crime and anti-money laundering checks (as required by law) for up to 10 years after termination or expiry of our contract with you. We retain details of complaints for up to 10 years from the date of receipt.

### **We shall keep records of the following for up to 10 years:**

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- electronic communications and minutes of face-to-face meetings;
- suitability and appropriateness assessments;
- periodic statements (for example, valuations); and
- all orders and transactions in financial instruments on your behalf (including information about your identity).
- Transferring information overseas

We may share your personal information with PWM Entities and service providers and this may involve transferring it to countries outside the European Economic Area (EEA) whose data protection laws may not be as extensive as those which apply to us. Where we do so, we will ensure that we do this in accordance with the Acts and take appropriate measures to ensure that the level of protection which applies to your personal information processed in these countries is similar to that which applies within the EEA. Such measures may include only transferring your data to jurisdictions in respect of which there is a European Commission adequacy decision or, where this is not the case, by using model clauses which have been approved by the European Commission which are available [here](#).

**We may transfer your personal information between businesses that are legally part of the PWM Entities for the purposes of providing our services to you as follows:**

- from our businesses based in the United Kingdom to our businesses based in India or the United States of America on the basis that we have established Data Processing Agreements containing model clauses as required under GDPR; and
- from our businesses based in India or the US to our businesses based in the United Kingdom on the basis that the United Kingdom is an authorised jurisdiction for the purposes of the relevant Acts.

## ***Your rights***

You have the right to request a copy of the personal data about you, which we hold, to have any inaccurate personal data corrected and to object to or restrict our using your personal data. You may also make a complaint if you have a concern about our handling of your personal data.

If you wish to do any of the above, please send an email to [compliance@palettewealth.com](mailto:compliance@palettewealth.com) We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data.

When we receive such a request we will endeavor to provide you with these details without delay and at the latest within one month of receipt. We may extend the period of compliance by a further two months where requests are complex or numerous. In such instances PWM will inform you within one month of the receipt of the request and explain why the extension is necessary.

When PWM receives a subject access request we will provide a copy of the information held free of charge. PWM may charge a reasonable fee to comply

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with requests for further copies of the same information. This does not mean that we will charge for all subsequent access requests rather that the PWM reserves the right to charge a fee based on the administrative cost of providing the information.

If after reviewing a request, we believe a request is manifestly unfounded or excessive, particularly if it is repetitive, then PWM may charge a 'reasonable fee' which will be decided on a case-by-case basis. In certain circumstances may even refuse to respond to such requests. You also have the following rights (unless exemptions apply), which can be exercised by contacting us using the details provided below:

- To ask us not to process your personal data for marketing purposes;
- To prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual;
- To request the rectification or completion of personal data which are inaccurate or incomplete;
- To restrict or object to the processing of your personal data (from 25th May 2018 onwards);
- To request its erasure under certain circumstances;
- In certain circumstances, to receive your personal data, which you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit that data to another data controller without hindrance, or to have that personal data transmitted to another data controller, where technically feasible (from 25th May 2018 onwards);
- To be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing; and
- To lodge a complaint about the way in which your personal data is being used to your Data Protection Authority: The Information Commissioner's Office (United Kingdom).

When you contact us to exercise any of the rights above, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity.

## ***DND Subscribers***

By submitting the forms on our website, the user consents to being reached out through email, WhatsApp or phone calls. This remains true for the DND subscribers as well.

## ***Changes to This Privacy Policy***

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

## **Palette Wealth Management Private Limited**

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

If you would like to lodge a complaint or exercise any of your rights set out above, you can contact us at:

E-mail: [compliance@palettewealth.com](mailto:compliance@palettewealth.com)

Communication Address : The Business Quarter 536, 5th Floor, Tower 2A, North Annex, One World Centre, Lower Parel, Mumbai - 400013, Maharashtra, India.