

**Privacy Policy - Market Pulse**

Market Pulse Securities Private Limited, a private limited company incorporated under the Companies Act, 2013 having CIN: U67190MH2021PTC356067, and having its Registered Office at Office no. 9/10, 4th Floor, Agnelo House, C.T.S. No F/186, S.V. Road, Khar West, Mumbai – 400052, referred to as “Company”, “We”, “Us” or “Our” which owns and operates the mobile application ‘Sniper’ (referred to as the “Platform”) is committed to protecting Your privacy and the information that You share while using the Platform. We value the trust You place in Us. That’s why We maintain the highest security standards for securing the transactions and Your information.

We may also allow Our group/affiliate entities such as Market Pulse Technologies Pvt. Ltd., to use Our Platform to offer their products and services to You, under applicable terms and conditions specified on Our Platform.

This Privacy Policy specifies the manner in which personal data and other information are collected, received, stored, processed, disclosed, transferred, dealt with or otherwise handled by the Company. This Privacy Policy does not apply to information that You provide to, or that is collected by, any third-party (excluding the Company or its group entities/affiliates set out in paragraph 3 below) through the Platform, and any Third-Party Sites that You access or use in connection with the services offered on the Platform.

Please read the Privacy Policy carefully prior to using or registering on the Platform or accessing/availing the services made available on the Platform including inter-alia in relation to stock broking services and KRA/KYC verification (“Services”).

By visiting the Platform, You (“You”), accept and agree to be bound by the terms and conditions of this Privacy Policy (“Privacy Policy”). This Privacy Policy is incorporated into and subject to the terms of use of the Platform (“Terms”) and shall be read harmoniously and in conjunction with the Terms.

#### 1. Collection of Information

We collect Personal Information (defined below) from You when You register or set up an account with Us on the Platform. This Privacy Policy applies to information (“Personal Information”) that:

You may provide to Us voluntarily while registering on Our Platform for using Our Services, such as mobile number, email address, password, date of birth, gender, Permanent Account Number (PAN), signature, marital status, nominee details, We may also ask You for certain

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financial information, including Your billing address, bank account details and/or other payment related details or other payment method data, and debit instructions or other standing instructions to process payments for the Services. We may ask You to provide certain additional information about Yourself on a case to case basis. All information disclosed by You shall be deemed to be disclosed willingly and without any coercion. No liability pertaining to the authenticity/ genuineness/misrepresentation/fraud/negligence, etc. of the information disclosed shall lie on the Company nor will the Company be in any way responsible to verify any information obtained from You;

We may retrieve from Your records available with third party including from Know Your Customer (KYC) Registration Agency (KRA) such as name, KYC details, KYC status, father's name, occupation, address details and related documents.;

Further, if You choose to invest through the Platform, We will also collect information about Your transactions including transaction status and details and Your investment behaviour; and When and if You download and/or use the Platform through Your mobile, We may receive information about Your location, Your IP address, and/or Your mobile device, including a unique identifier number for Your device. We may use this information to provide You with location-based Services including but not limited to search results and other personalized content. You can withdraw Your consent at any time by disabling the location-tracking functions on Your mobile. However, this may affect Your enjoyment of certain functionalities on Our Platform.

All transactional information including financial information gathered by the Company shall be stored on servers, log files and any other storage system owned by the Company or by third parties in India. Our primary goal in doing so is to provide You a safe, efficient, smooth and customized experience on the Platform. The information collected allows Us to provide the Services and features on the Platform that most likely meet Your needs, and to customize the Platform to make Your experience safer and easier. More importantly, while doing so, We collect the above – mentioned Personal Information from You that We consider necessary for achieving this purpose.

We may also collect certain non-personal information, such as Your internet protocol address, web request, operating system, browser type, URL, internet service provider, IP address, aggregate user data, browser type, software and hardware attributes, pages You request, and cookie information, etc. which will not identify with You specifically (“Non – Personal Information”), while You browse, access or use the Platform. We receive and store Non – Personal Information, by the use of data collection devices such as “cookies” on certain pages of the Platform, in order to help and analyze Our web – page flow, track user trends, measure promotional effectiveness, and promote trust and safety. We offer certain additional features on the Platform that are only available through the use of a “cookie”. We place both permanent and temporary cookies in Your computer’s hard drive.

We also use cookies to allow You to enter Your password less frequently during a session on the Platform. Most cookies are “session cookies,” meaning that they are automatically deleted from Your hard drive at the end of a session. You are always free to decline Our cookies if Your

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browser permits, although in that case, You may not be able to use certain features or Services being provided on the Platform or You may be required to re-enter Your password each time you log – in or access the Platform during a session.

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses first-party cookies to report on Your interactions with our Platform services. These cookies store non-personally identifiable information.

In general, You can browse the Platform without telling Us who You are or revealing any Personal Information about Yourself. In such a case, we will only collect and store the Non – Personal Information. Once You give us your Personal Information, You are not anonymous to Us. Wherever possible, while providing the information to Us, We indicate which fields are mandatory and which fields are optional for You. You always have the option to not provide the Personal Information to Us through the Platform by choosing to not use a particular Service or feature being provided by Us on the Platform, which requires You to provide such information. We may automatically track certain information about You based upon Your behaviour on the Platform. We use this information to do internal research on Your demographics, interests, and behaviour to better understand, protect and serve You. This information is compiled and analysed by the Company on an aggregated basis and not individually, in a manner that does not specifically identify You.

If You choose to post messages on our message boards, chat rooms or other message areas or leave feedback, We will collect and store such information You provide to Us. We retain this information as necessary to resolve disputes, provide customer support, respond to queries and inquiries, and troubleshoot problems and improve the Services.

If You send us correspondence, such as emails or letters, or if other users or third parties send us correspondence about Your activities or postings on the Platform, We may collect and retain such information into a file specific to You for responding to Your request and addressing concerns in relation to Your use of the Platform. We shall be entitled to retain Your Personal Information and other information for such duration as may be required for the purposes specified hereunder and will be used by Us only in accordance with this Privacy Policy.

### Aadhaar user consent policy

#### Voluntary Act

The act of providing your Aadhaar is voluntary in nature, which will only be required for completing your account opening procedure online and for digitally signing the Market Pulse account opening form.

#### Market Pulse does not store any Aadhaar information

During your online account opening process, you need to input Aadhaar details on the Market Pulse platform. You would be issuing your Digital Aadhaar to Digilocker, from where Market Pulse (Market Pulse is registered as a Requester on the Digilocker platform) would receive

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information, based on your consent to allow Digilocker to share such information with Market Pulse, limited to: (1) The last four digits of your Aadhaar / VID (Virtual ID created on the UIDAI website), (2) Full Name, (3) Date of Birth, (4) Gender, (5) Address, and (6) Your Photo.

Digilocker is a part of the National eGovernance Division under the Ministry of Electronics & Information Technology (MeitY), Government of India. The Digital Aadhaar issued within DigiLocker is the same as the eAadhaar issued by UIDAI (<https://eaadhaar.uidai.gov.in>). DigiLocker has partnered with UIDAI to make it available automatically to its users when they link their DigiLocker account with Aadhaar. This act of issuing an eAadhaar within Digilocker and subsequently Digilocker sharing the information limited to the above points, leads to behaving as a physical KYC. Market Pulse only receives information limited to the above points for the purposes of completing KYC of clients online.

During your online account opening process, you would also be sharing your Aadhaar with Digiotech Solutions Pvt. Ltd. for the purpose of digitally signing the Market Pulse account opening form. Digiotech Solutions Pvt. Ltd. does not share your Aadhaar with Market Pulse. After the account opening form has been digitally signed by you, a copy of the digitally signed form would be emailed to you and to Market Pulse for reference/audit purposes. Digiotech Solutions Pvt. Ltd. is a licensed e-Sign ASP (Application Services Provider) with CDAC, compliant with the guidelines laid down by the Controller of Certifying Authorities (CCA), India and UIDAI, to enable you to eSign the account opening forms online.

### 2. Use of Your Information

We use the Personal Information and other Non-Personal Information, for the following:

- to provide and improve the Services on the Platform that You request;
- to resolve or investigate disputes/claims/complaints and troubleshoot problems;
- to help promote a safe service on the Platform and protect the security and integrity of the Platform, the Services and the users;
- collect money from You in relation to the Services,
- inform You about online and offline offers, products, services, and updates;
- customize Your experience on the Platform or share marketing material with You;
- to detect, prevent and protect Us from any errors, fraud and other criminal or prohibited activity on the Platform;
- enforce and inform about our terms and conditions;
- to process and fulfill Your request for Services or respond to Your comments, and queries on the Platform;
- to contact You;
- to carry credit checks, screenings or due diligence checks as lawfully required by us;
- to undertake financial / regulatory / management reporting, and create and maintain various risk management models;
- for conducting audits and for record keeping purposes;
- to allow Our business partners and/or associates to present customised messages to You;
- to undertake research and analytics for offering or improving our services and their security and service quality

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- To conduct monitoring by us or any other person on our behalf using various methods, including: (i) the use of "intelligent" automated monitoring tools; or (ii) through random monitoring of systems, for example systematically via electronic communication recording tools; (iii) data tracking, aggregation and analysis tools that pull data from various disparate data sources to draw linkages and/or detect behavioral patterns, interactions or preferences for analysis (including predictive analysis); and/or (iv) using other similar monitoring technology that may become available from time to time;
- For statistical purposes and for market research and product analysis and to develop and improve our products and services;
- to communicate important notices or changes in the Services, use of the Platform and the terms/policies which govern the relationship between You and the Company and with Our affiliates as set out in paragraph 3 below for providing Services to You; and
- for any other purpose after obtaining Your consent at the time of collection.

You also specifically agree and consent to Us collecting, storing, processing, transferring and sharing information (including Personal Information) related to You with third parties such as Banks, financial institutions, credit information companies, entities registered under applicable laws with Securities Exchange Board of India, National Stock Exchange of India Limited, Multi Commodity Exchange, BSE Limited, Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI), payment gateways, collecting banks, KRAs etc. solely for the purpose of reviewing your profile and processing your transaction requests for the Services or for such other products/services offered by us or our group, affiliate or associates.

In addition to the above, We identify and use Your IP address to help diagnose problems with Our server, resolve such problems and administer the Platform. Your IP address is also used to help identify you and to gather broad demographic information.

We may occasionally ask You to complete optional online surveys. These surveys may ask You for Your contact information and demographic information (like zip code, age, or income level). We use this information to tailor Your experience at the Platform, providing You with content that We think You might be interested in and to display content according to Your preferences. We use Your Personal Information to send You promotional emails, however, We will provide You the ability to opt-out of receiving such emails from Us. If You opt out, the Company may still send You non-promotional emails, such as emails about the Services and Your account on the Platform. Unless and until, You explicitly give Your consent to Us, to do so, We will not share Your Personal Information with another user of the Platform and vice versa.

We may from time to time use cookies. Cookies are small data files that a website stores on Your computer. Market Pulse may use persistent cookies which are permanently placed on your computer to store non-personal (Browser, ISP, OS, Clickstream information etc) and profiling information (age, gender, income etc). While cookies have unique identification nos, personal information (name, a/c no, contact nos etc) shall not be stored on the cookies. We will use the information stored in the cookies to improve Your browsing experience on our Platform, by throwing up relevant content where possible. We will also use the cookies to store visitor preferences to ease visitor navigation on the Platform.

### 3. Sharing of information

We do not share any of your information with third parties except: (i) with respect to providing the information or services that you have requested earlier, (ii) or with your express permission for sharing such information, or (iii) with intermediaries/applications who require such information as per regulatory requirements and procedure laid down by SEBI/Exchanges.

We may make Your Personal Information and/or other Non-Personal Information available to Our group entities/ affiliates including Market Pulse Technologies Private Limited (Market Pulse Technologies) to enable providing You Services through the Platform. Please note that all information shared with our group entities or affiliates or made available to our group entities or affiliates will be governed by the terms of this Privacy Policy.

We may also disclose Your Personal Information to third party vendors, consultants, and other service providers who work for the Company, who are bound by contractual obligations to keep such personal information confidential and use it only for the purposes for which We disclose it to them. This disclosure may be required for Us, for instance, to provide You access to Our Services and process payments including validation of Your bank accounts, to facilitate and assist Our marketing and advertising activities/initiatives, for undertaking auditing or data analysis, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to Our Services. We do not disclose Your Personal Information to third parties for their marketing and advertising purposes without Your explicit consent.

The Company may disclose Your information, to the extent necessary: (i) to comply with judicial, administrative and regulatory entities to comply with any legal and regulatory requirements, (ii) to protect the rights and property of the Company, Our users, and others, including to enforce the Terms, and (iii) in an emergency to protect the personal safety and assets of the Company, the users, or any person. In such an event the Company is in no manner responsible for informing You or seeking Your approval or consent. We and Our group entities or affiliates (to the extent Personal Information is collected by them) may, in compliance with applicable laws, share/transfer/assign all of Your Personal Information and other information with any other business entit(ies), in the event of a merger, sale, re-organization, amalgamation, joint ventures, assignment, restructuring of business or transfer or disposition of all or any portion of Our business.

Under no circumstances will we sell or rent your personal information to anyone, for any reason, at any time. We have taken the best and reasonable steps to ensure prevention of any unauthorised disclosure of your sensitive personal information.

#### 4. Links to Other Third – party Sites and collection of information

Our Platform may link You to other third – party Platforms (“Third – Party Sites”) that may collect Your Personal Information including Your IP address, browser specification, or operating system. The Company is not in any manner responsible for the security of such information or their privacy practices or content of those Third – Party Sites. Additionally, You may also encounter “cookies” or other similar devices on certain pages of the Third – Party Sites and it is hereby clarified by the Company that the Platform does not control the use of cookies by these

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Third – Party Sites. These third-party service providers and Third-Party Sites may have their own privacy policies governing the storage and retention of Your information that You may be subject to. This Privacy Policy does not govern any information provided to, stored on, or used by these third-party providers and Third-Party Sites. We recommend that when You enter a Third-Party Site, You review the Third Party Site’s privacy policy as it relates to safeguarding of Your information. We use third-party advertising companies to serve ads when You visit the Platform. These companies may use information (not including Your name, address, email address, or telephone number) about Your visits to the Platform and Third-Party Sites in order to provide advertisements about goods and services of interest to You. You agree and acknowledge that We are not liable for the information published in search results or by any Third-Party Sites.

### 5. Security Precautions and measures

Our Platform has reasonable security measures and safeguards in place to protect Your privacy and Personal Information from loss, misuse, unauthorized access, disclosure, destruction, and alteration of the information in compliance with applicable laws. Further, whenever You access Your account on the Platform or any information relating to it, We offer the use of a secure server. We cannot however ensure or warrant the security of any information You transmit to the Company or guarantee that Your Personal Information and/or other Non-Personal Information provided for availing the Services or accessing the Platform will not be accessed, disclosed, altered or destroyed by a breach of any of Our security measures and safeguards. It is further clarified that You have, so long as You access and/or use the Platform (directly or indirectly), the obligation to ensure that You shall at all times, take adequate physical, managerial, and technical safeguards, at Your end, to preserve the integrity and security of Your data which shall include and not be limited to Your Personal Information. When payment information is being transmitted on or through the Platform, it will be protected by encryption technology. You expressly consent to the sharing of Your information with third party service providers, including payment gateways, to process payments and manage your payment-related information. Hence, the Company cannot guarantee that transmissions of Your payment-related information or Personal Information will always be secure or that unauthorized third parties will never be able to defeat the security measures taken by the Company or the Company’s third-party service providers. The Company assumes no liability or responsibility for disclosure of Your information due to errors in transmission, unauthorized third-party access, or other causes beyond its control. You play an important role in keeping Your personal information secure. You shall not share Your Personal Information or other security information for Your account with anyone. The Company has undertaken reasonable measures to protect Your rights of privacy with respect to Your usage of the Platform controlled by Us and Our Services. However, We shall not be liable for any unauthorized or unlawful disclosures of Your personal information made by any third parties who are not subject to Our control.

### 6. Your Consent and Changes to Privacy Policy

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Your Consent: By visiting the Platform or setting up/creating an account on the Platform for availing the Services on the Platform at such time, You signify Your acceptance to the provisions of the Privacy Policy.

Withdrawal of consent: You may choose to withdraw Your consent provided hereunder at any point in time. Such withdrawal of consent must be sent in writing to [writetous@market-pulse.in](mailto:writetous@market-pulse.in). In case You do not provide Your consent or later withdraw Your consent, We request you not to access the Platform and/or use the Services and also reserve the right to not provide You any Services through the Platform.

Changes to Privacy Policy: We reserve the unconditional right to change, modify, add, or remove portions of this Privacy Policy at any time, without specifically notifying You of such changes. Any changes or updates will be effective immediately. You should review this Privacy Policy regularly for changes. You can determine if changes have been made by checking the “Last Updated” legend above. Your acceptance of the amended Privacy Policy shall signify Your consent to such changes and agreement to be legally bound by the same.

### 7. Grievance Officer

You may contact us on any aspect of this policy or for any discrepancies / grievances with respect to your Personal Data, by writing to our Compliance Officer at [compliance@market-pulse.in](mailto:compliance@market-pulse.in).

### 8. Questions?

Please feel free to contact us at [writetous@market-pulse.in](mailto:writetous@market-pulse.in) regarding any questions on the Privacy Policy.