

## Privacy Policy

Kotak Mahindra Asset Management Company Limited (hereinafter “Kotak AMC/ We/ Us”) , in the course of its business and while dealing with the investors, vendors, distributors (hereinafter “Provider of Information/ Provider”) may become privy to the personal information of the Provider of Information, including information that is of a confidential nature.

We are strongly committed to protecting the privacy of the Provider of Information. This Privacy Policy (as amended from time to time) describes how we handle and deal in personal information that we may collect and retain, vide various avenues including but not limited to usage of the various services both in the physical (offline) and online/electronic mode.

Such Personal Information collected by Us vide the physical (offline) and online/electronic mode may be converted and stored in an electronic form at our sole discretion for the purposes mentioned hereunder. This Privacy Policy shall be read with and subject to the disclaimer notified on the Website.

However, the Provider of Information shall not be covered by this Privacy Policy, if he accesses any other/ third party links from the Website.

By visiting our website and using the services as provided by Us (either through the Website, vide our various Internet and other applications or through the physical means) including but not limited to subscribing, sending of inquiries etc, the Providers expressly agree to this Privacy Policy. Further, by accessing the Website and/or utilizing the services provided by Us (both through online/electronic or vide physical (offline) means) the Provider shall be treated as expressly giving their consent for the processing, retention and utilization of the Personal Information in accordance with this Privacy Policy and the terms hereof.

### Personal Information:

The Personal Information that we collect from the Provider of Information may include information that is of a confidential nature, and shall mean and include any information that relates to a person, which either directly or indirectly, in combination with other information that is available or likely to be available to Us, is capable of identifying the Provider of the Information (“Personal Information”).

The type of Personal Information collected from the Provider and covered under this Privacy Policy shall include the following, relating to:

- Full name
- Address
- Telephone number(s)
- E-mail address
- Password (in the event of the Investor signing up for the online facilities)
- Financial information (pertaining to the investments/ applications/ transactions and any other related purposes vide which we would be providing the services to the Investors);and

- Any other information as defined under Rule 3 of the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011, as may be required by Us from time to time in order to provide services to the Provider of Information.

However, any information that is freely available in the public domain is exempt from the above definition.

The Provider of Information herein shall have the right to approach and modify the Personal Information that has been retained with Us. Please note, that we shall not be responsible for the accuracy of the information that is being provided by the Investors.

#### Collection of Personal Information:

Personal Information is collected and/or obtained by Us from several sources, wherein the Provider of Information has provided for the same. The information provided may include such Personal Information as a part of the application and/or enrollment process (the same maybe online or vide a physical application form). Additionally, we may obtain the Personal Information from third-parties, or through call recordings at our call centers, internet technology, including our Website.

Information shall also be collected from vendors/ distributors and/or any other service providers for maintenance of our records and for processing of the payments/ commissions etc.

The Provider of Information agrees and understands that the Personal Information collected by Us shall be processed, stored and used by Us, and the same may also be passed to, transmitted to and processed by our affiliates and other data processors, agents or service providers acting under a contract with Us for the purposes identified herein.

#### Security Standards and Measures:

We have adopted reasonable security practices and procedures and have implemented such reasonable security practices and safeguards which are appropriate to the sensitivity of the Personal Information. These security practices and standards are consistent with generally accepted standards of commercial business practice, which includes technical, operational and physical security control measures which commensurate with the Personal Information being protected from any unauthorized access and/or disclosures while the same is with Us.

The Provider of Information, especially the investors agree and understand that trusted third parties who act on our behalf for performing of certain functions such as processing of transactions, issuing account statements etc. are under contractual obligations to ensure reasonable security safeguards commensurate to the sensitivity of the Personal Information being handled by them.

Kotak AMC endeavours to safeguard and ensure the security of the information provided by the Provider of Information and uses 128-bit encryption wherever applicable, for the transmission of the information, which is currently the permitted level of encryption in India.

#### Use of Personal Information:

The Provider (s) expressly agree and understand that:

1. Kotak AMC may use the Personal Information of the Provider for the purposes of providing him with the services to which he has subscribed and any service- related activities such as processing instructions, responding to service requests, resolve any grievances etc. The same may also be used to contact you whenever required and also to seek your feedback in relation to the offered services.
2. The Contact information (like e-mail address, phone number, etc) may be used to send periodic information on the services or upcoming events or announcements.
3. The Personal Information may be used to generate statistics and reports for both internal use and for sharing with affiliates, intermediaries, successors, vendors, service providers and advertisers. Such statistics and reports will not contain Personal Information that could identify the Provider of Information, personally.

#### Disclosure of Personal Information:

Kotak AMC may disclose the Provider's information in order to:

- Conform to legal and/ or statutory requirements or comply with legal process;
- Protect and defend Kotak AMC's or its Affiliates' rights, interests or property;
- Enforce our legal rights, terms and conditions or provisions of the offer documents of Schemes of the Mutual Fund/ Portfolio Management Services/ any other products or services.

#### Sharing of Personal Information with Third Parties:

To the extent required or permitted under law, we may share the Investor's Personal Information for the uses mentioned here with the following third parties:

- Registrar and transfer agent (s), call centers, Banks, custodians, depositories and/ or authorized external third parties who are involved in transaction processing, dispatches, etc., of investors' investment with Us and/or who are vendors/ service providers/ distributors to whom commission is paid;
- Distributors or sub-brokers or intermediaries through whom applications are received and whose ARN number is stamped on the application form/ transaction slips;
- Any other organization for verifying the identity of investors for complying with anti-money laundering requirements;
- Any governmental authority including but not limited to the Reserve Bank of India and/ or the Securities and Exchange Board of India;
- Certain Personal Information may be shared with post office, local & international courier service providers and other intermediaries for correspondence with the Provider of Information and for making payments to the Provider by cheques, drafts, warrants, through electronic clearing services, NEFT etc.

We will on a best effort basis ensure that Personal Information is transferred to the third parties, on an assurance from them that reasonable and appropriate steps have been taken to maintain the required level of data protection.

The Personal Information so collected shall be communicated to third parties / third persons only for the reasons consistent with the purposes for which such Personal Information was originally collected or such purposes as authorized by law.

#### Direct Marketing:

Any, non-personally identifiable visitor information may be provided to the third parties for marketing, advertising, or other uses however Personal Information shall not be shared for direct marketing without the express permission of the Provider of Information.

#### Retention of Personal Information:

We may retain Provider's Personal Information for as long as required to provide our services to the Investor or otherwise if required under law.

#### Breach of Internet Security:

In addition to the efforts of Kotak AMC for the protection of the Personal Information, it is important that the Provider of Information should co-operate with Kotak AMC for the security of the Personal Information. It is recommended that the Providers, especially the investors should necessarily choose their passwords carefully such that no unauthorised access is made by any third party and not to disclose the same to any one and or keep a record of the same in writing.

However, despite our best efforts, if unauthorized persons breach our security control measures resulting in the website being hacked or presenting inaccurate information etc., Kotak Mahindra Asset Management Company Limited, Kotak Mahindra Mutual Fund, directors, officers, employees or affiliates' will not be responsible.

#### Incidental Information:

#### Cookie Policy:

When you visit our Website, we use cookies, which are small pieces of information that allow Us to maintain your connection to our Website. The Website may use cookies for detecting what kind of device you have in order to present content in the best way, for a language switch and/or for other purposes. These cookies do not collect or store any Personal Information and the visitor including the Provider of Information can refuse the use of cookies.

#### Website Analytics:

The Website ("[www.assetmanagement.kotak.com](http://www.assetmanagement.kotak.com)") and a web analytics service (which may be used by Us) uses cookies to help the Website operators analyse how users use the Website. The information generated by the cookie about the visitors' use of the Website (including the IP address) will be transmitted to and stored as part of the normal operation of services. Also, information may be supplied to the owners or operators of third party websites from which it is possible to link to our Website with information relating the number of users linking to our Website from such third party websites. The information shared shall be non- personally identifiable information.

All such incidental information will be used only to assist Us in providing an effective service on the Website.

## Grievance Redressal:

Any grievance relating to your Personal Information may be addressed to [IR.CC@kotak.com](mailto:IR.CC@kotak.com)

This Privacy Policy is current, valid and up to date as per the laws, rules and regulations that have been enacted in this regard. This Privacy Policy may be updated or amended from time to time and the Providers of Information are advised to visit this page regularly in order to view the same.