

DSP Merrill Lynch Privacy Statement

Our privacy commitment:

- **Protect personal information**
- **Explain how we use personal information**
- **Offer choices on the use of personal information and honour choices**
- **Collect, use and process personal information respectfully and lawfully**

This document includes information about how DSP Merrill Lynch companies manage personal information relating to clients:

1. Our security commitment
2. What personal information we collect
3. Purposes for which we use personal information
4. Sharing personal information
5. Transfers of personal information to other countries
6. Data integrity and retention
7. Honouring choices
8. Enquiries

DSP Merrill Lynch companies recognise the importance of protecting personal information in compliance with applicable legal and regulatory requirements. We have policies and practices in place to ensure compliance with the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules 2011 ("Information Security Rules 2011").

1. Our security commitment

Keeping personal information secure is one of our most important responsibilities. We maintain physical, technical, electronic, procedural and organisational safeguards and security measures to protect personal information against accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, or access, whether it is processed by us in India or elsewhere. Appropriate employees are authorised to access personal information for legitimate and specified business purposes. Our employees are bound by a code of ethics and other internal policies that require confidential treatment of personal information and are subject to disciplinary action if they fail to follow such requirements.

2. What personal information we collect

We collect, use and process various types of personal information to the extent appropriate for our relationship with each client. The personal information that we collect may include, but is not limited to, name, address, email address, telephone number, date of birth, personal identifiers such as Aadhaar number, Permanent Account Number, passport details, driver licence, other personally identifiable information, and sensitive personal data or information as defined in the Information Security Rules 2011.

Usually, in the case of clients who are individuals, we collect personal information directly from the individuals; in the case of corporate and institutional clients, we collect personal information about individuals indirectly through our clients.

When individuals communicate with DSP Merrill Lynch companies, to the extent permitted or required by applicable law, telephone conversations and electronic communications, including emails, text messages and instant messages, may be recorded and/or monitored for evidentiary, compliance, quality assurance and governance purposes.

3. Purposes for which we use personal information

We use and process personal information for a range of purposes, which may include but is not limited to:

- to provide products and services
- to facilitate transactions
- to provide advice and guidance
- to respond to client requests
- to detect, prevent and investigate fraud
- to provide security for clients, employees and the general public
- to verify identity
- to perform risk management
- to comply with applicable laws, rules and regulations, including anti-terrorism, anti-money laundering, anti-bribery, anti-corruption and tax reporting rules and regulations
- to comply with legal process, to respond to requests from public, regulatory or government authorities (including authorities outside India), and to allow us to pursue remedies and limit damages
- to perform internal business processes such as data analysis, audits, developing and improving new products and services
- as part of the sale, merger or similar change of a Bank of America Merrill Lynch group business

4. Sharing personal information

To the extent appropriate for our relationship with each client, personal information may be shared for all of the purposes described in this document.

We may share personal information with Bank of America Merrill Lynch group companies around the world. All affiliates are committed to protecting personal information and to using it only for legitimate purposes.

We may share personal information with service providers that work for us in India or any of the countries in which we operate. We supervise our service providers and require them to appropriately protect personal information. Service providers may include:

- customer service, payment or transaction processing companies
- printing companies
- order fulfillment or professional services organisations (such as legal, audit, accounting services, technology, and data processing companies)
- technology hosting (such as webhosting, cloud computing, infrastructure provision, application service providers, data centre services and technology service providers)

We may also share personal information with other third parties. These third parties may include public, regulatory and government authorities, intermediaries, other nonaffiliated third parties as requested by clients or their authorised representative, self-regulatory organisations, or judicial or law enforcement authorities.

Additionally, where an individual has or proposes to have a relationship with a third party (contractual or otherwise) in connection with a product or service, we may share information with such third party in accordance with that relationship, and the handling of information by that party will be subject to the individual's agreement(s) with that party.

As required by the Aadhaar (Authentication) Regulations 2016, we share Aadhaar numbers and other identity information with the Unique Identification Authority of India for purposes of Aadhaar authentication. Service providers may be engaged to facilitate the authentication process.

5. Transfers of personal information to other countries

Due to the global nature of the Bank of America Merrill Lynch group, personal information may be transferred around the world to countries in which Bank of America

Merrill Lynch group companies do business, including to affiliates, service providers or third parties, which may be located in jurisdictions that may not have the same data protection laws as those in India. We are responsible for making sure that personal information continues to be protected by affiliates and service providers in other countries.

6. Data integrity and retention

We process personal information in a manner that is adequate, relevant and not excessive in relation to the purposes for which it is collected or further processed. We endeavour to keep personal information for only so long as is necessary for the purposes for which it was collected, to meet legal and regulatory requirements, and in keeping with the period required or permitted by law.

7. Honouring choices

Individuals have the right to not provide (or to withdraw by written notice at any time) consent to the collection, use, processing and sharing of personal information. If individuals choose to not provide (or to withdraw) consent, we may not be able to provide certain products and services.

Individuals have the right to request to review personal information that they have provided and to request correction or amendment of such personal information if it is inaccurate or incomplete, where feasible.

8. Enquiries

For any questions regarding the collection, use, processing and sharing of personal information (including specific details of entities with which we share personal information), please contact our Grievance Officer for DSP Merrill Lynch (Mr Jinendra Shah) at:

Ground Floor, A Wing, One BKC,
G Block, Bandra Kurla Complex,
Bandra (East), Mumbai - 400051

For the most up-to-date Privacy Statement, visit our website at: www.ml-india.com.