

Privacy Policy

This Privacy Policy explains how NSE (“we”, “our”, and “us”) will collect and protect Personal Information (as described below). By registering for the platform being offered by NSE for the private placement of debt securities (the “Platform”) or by otherwise submitting Personal Information to NSE through this website (the “Site”), you give your consent to the collection and use of your Personal Information as explained in this Privacy Policy.

The term “Personal Information” refers to non-public information that personally relates to or identifies you as an individual or entity.

This Policy is a part and parcel of our Terms and Conditions and all capitalized terms used but not defined in this Policy have the meaning given to them in the Terms and Conditions. This Policy applies to both current and former Members on the Platform. If you are a registered member (“Member”) of the Platform, you have agreed and are additionally subject to the Terms and Conditions of the Platform, which incorporates this Privacy Policy by reference. We recommend that you carefully read the **Terms and Conditions** of the Platform before registering with us, or providing us any Personal Information. In case of any conflict between the terms of this Privacy Policy and the Terms and Conditions, the terms of the former shall prevail.

What information do we collect?

Members will be required to share Personal Information at the time of registering with the Platform to help NSE verify their identity, to correspond with them, and to allow it to fulfill its legal and regulatory requirements. This information is used by NSE to verify and authenticate the Members, and is collected only on the basis of necessity. NSE also collects and maintains information about its Members in the course of their participation in issues as issuers or bidders, as the case may be, who have availed of the services of the Platform in the context of an issue of debt securities by way of private placement.

We collect Personal Information from the following sources:

- Information provided on the registration documents, while completing a form, including, in case of individuals – an individual’s full legal name, address, date of birth, e-mail ID and telephone number, relevant proof of identification such as PAN or Passport number, and confidential documentation used to verify those details, telephone number, e-mail address and similar information; and in case of body corporates or other institutions – Name and address of the Company/Firm, date of incorporation and date of commencement of business, registration number (with ROC, SEBI or any government authority), details of PAN, details of Promoters/Partners/Key managerial Personnel of the Company/Firm in the specified format, Bank and Depository Account Details, copies of the balance sheet for the last 2 financial years (copies of annual balance sheet to be submitted every year), copy of latest share holding pattern including list of all those holding more than 5% in the share capital of the company, duly certified by the Company Secretary / Whole time Director/MD, copies of the Memorandum and Articles of

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Association in case of a company / body corporate, partnership deed in case of a partnership firm, copy of the Resolution of board of directors' approving participation in debt issue and naming authorized persons for dealing in such securities, photographs of Partners/Whole time directors, individual promoters holding 5% or more, either directly or indirectly, in the shareholding of the company and of persons authorized to deal in securities, if registered with any other broker, then the name of broker and concerned Stock exchange and Client Code Number.

- The issues carried out on the Platform, such as investment amounts or bid details; and
- Other personally identifiable information about Members and third parties that may be disclosed (including by authorizing third parties to disclose) to us and/or its third-party service providers and its business affiliates, including by completing profile forms, completing applications, questionnaires or similar documents, communicating with customer service personnel, and otherwise interacting with us and our third-party service providers and business affiliates.
- We will not solicit the sharing of any personal or private information from you through emails, phone calls, or through any like medium other than our Site, or by means previously disclosed.

If you submit any Personal Information of or relating to a third party to us or our third-party service providers or business partners in connection with the site, you represent that you have the authority to do so and to permit us to use and disclose such information in accordance with this Policy.

What do we use your information for?

Any of the information we collect from you may be used in one of the following ways:

- To confirm your identity, and to avoid fraud or other misconduct and to validate the information provided by you to us.
- To correspond with you. We may need to send you administrative information, including information regarding the Site and changes to the Terms and Conditions and other policies including this Privacy Policy.
- To enable the issue of securities - to the extent you upload Personal Information and sign documentation via the Site in connection with an investment or sale of debt securities, we may share your Personal Information and the documentation executed by you with the parties involved in the issue. Accordingly, bidder information, including Personal Information and other information such as the auction and bid details, will be shared with the issuer whose securities the bidder may wish to purchase. Issuer information will be shared to potential bidders post their approval, and only to pre-identified bidders.

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- To improve the Platform's services – we may use your Personal Information provided by you at the time of your registration and otherwise from time to time during your participation in an issue to enhance the user experience of our websites in relation to the Platform.

How do we protect your information?

In order to protect against the loss, misuse and alteration of the information entrusted to, shared with, or disseminated by us, we take generally accepted and industry standard security measures, both during the transmission and storage of such information. When you enter private, personal or confidential information on our registration forms or other forms specific to your need, we uniformly encrypt such information using secure socket layer technology (SSL). All sensitive information such as passwords of Members is encrypted when stored on our servers.

We are committed to keeping your information secure and using it appropriately. We have adopted this Privacy Policy to ensure that your personal information is handled safely and responsibly, and we will unfailingly:

- Respect your trust and the confidential nature of the information you provide through your financial relationship with us;
- Limit the collection and use of your Personal Information to that which we believe is necessary to serve you, administer our business or tell you about our services;
- Restrict employee access to your Personal Information to those employees who need access to such information in order to provide you with services related to the issues you are participating in through the Site;
- Continually educate the members of our team to constantly reinforce the importance of confidentiality and client privacy;
- Maintain appropriate physical, electronic and procedural safeguards and controls, including encryption technologies, designed to protect your Personal Information, in line with industry standards and practices, to protect information about you; and
- Quickly respond to your request to correct any inaccurate information.

We have invested in software systems and procedures aimed at offering you a safe and secure environment and protect your personal, financial and historical information. We plan to constantly review, refine and upgrade our security technology as new tools become available.

However, please be aware that no security measures are perfect or impenetrable. In unforeseen circumstances of technical failures or malfunctions, we will not be responsible to any Member or participant for any damage or loss resulting from it. We are not responsible for third party circumvention of any privacy settings or security measures on our Site. In such cases we cannot guarantee that only authorized persons will view your personal information, and we cannot ensure that information you share on our Site will not become publicly available, unless such breach of security has been caused as a direct result of our gross negligence or wilful default. You can reduce some of these risks by using common sense security practices such as choosing a strong password and using up to date antivirus software. Your user identification and

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password are personal to you and should not be made available to any other person. Also, you should discontinue their use and notify us if you have any reason to suspect that someone else may be using them. We do not store or exercise any control over your user identification and password details, and bear no responsibility for the safekeeping of the same.

Please also be informed that we may use third-party cloud service providers that provide hosting, data storage and other services pursuant to standard terms and conditions that are generally non-negotiable; accordingly, although we seek to conduct reasonable due diligence on such service providers, we may be unable to impose contractual obligations on them with respect to the measures they use to protect Personal Information. We are not responsible for the data security measures of any third parties.

Do we use cookies?

Yes. "Cookies" are a feature of a web browser that allows web servers to recognize the computer used to access a site. They are small pieces of data that are stored by a user's web browser on the user's hard drive. Information gathered through cookies and web server logs may include information such as the date and time of visits, the pages viewed, time spent at this site, and the websites visited just before and just after this Site. Cookies can remember what information a user accesses on one web page to simplify subsequent interactions with that site by the same user or to use the information to streamline the user's interactions on related web pages. This makes it easier for a user to move from web page to web page and to seamlessly navigate the Site. Cookies should make your online experience easier and more personalized. Cookies are only read by the server that placed them, and are unable to execute any code or virus.

We use site browser software tools such as cookies and web server logs to gather information about this site's Users' browsing activities, and gain insights into trends and statistics in order to improve this site and better serve the Users of this site. This information helps us to design and arrange our web pages in the most user-friendly manner and to continually improve this site to better meet the needs of our current and prospective users. We do not link cookies to personally identifiable information, and all information gathered through cookies is gathered in a manner so as to preserve the anonymity of its source, and is kept strictly confidential. The information is used and analyzed only at an aggregate level and none of this information is reviewed at an individual level.

Nevertheless, you can constantly control how and whether cookies would be accepted by your web browser; if you do not want your details to be used in this manner, you can either disable your cookies or opt-out at the relevant download or request page. For more information on how to do so, please refer to the documentation accompanying your browser. However, if you have turned off all cookies, many features of this Site may not be available to you.

Importance of Accurate Information

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We have security standards and procedures in place designed to prevent unauthorized access to your information. A key part of this process helps ensure that all information we have about you is both current and accurate so as to avoid any mismatch of your details with any specific issue. Our services primarily rely on relevant Members details that are submitted, which play a key role in accurately and efficiently mapping Members to specific issues, and help us ensure that are services are provided properly and without any error or lapses. Therefore, if your information changes, we urge you to update your information in your Member Profile page, and if you ever discover inaccuracies in our data, we encourage you to notify us immediately.

Do we disclose any information to outside parties?

Your right to privacy, and the confidentiality of your Personal Information, are of paramount importance to us. Any information provided by you will not be shared with any third party, except for the intended purpose for which such information is provided by you, in which case your consent would be implied. To the extent that you upload Personal Information and sign necessary documentation via the Site in connection with an issue, we may share your Personal Information and the documentation that you execute with the parties with which you are transacting, for which your prior authorization shall be sought. Accordingly, bidder information will be shared with the issuer whose business the bidder expresses interest in. Where consented to by you, we will share your Personal Information with other selected and pre-disclosed Members only to the extent necessary to enable such Members to effectively participate in the issues held on the Platform.

We may share information with our affiliates if the information is required to provide the services you request. An affiliate is a company that we own or control, or with which there is common ownership with us. As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Information may be part of the transferred assets.

With your prior consent, we may also share your Personal Information with our third-party service providers that may provide services such as hosting of the Site, data analysis, IT services and infrastructure, customer service, e-mail delivery, auditing, information and identity verification, background checks, credit checks, payment processing and other similar services. In such an event, the third parties' use of your information will be bound by the Privacy Policy

We do not however rent, sell, or share Personal Information about you with other people or non-affiliated companies for their direct marketing purposes.

We reserve the right to disclose Personal Information when required by law, to regulatory, law enforcement, or government authorities.

Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our Site. These third party sites have separate and independent privacy policies, and you are

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advised to peruse the policies regarding privacy and related topics posted by such third party sites before use. We are not responsible for third party content accessible through the Site, including opinions, advice, statements and advertisements, and you shall bear all risks associated with the use of such content. We are not responsible for any loss or damage of any sort which you may incur from dealing with any third party.

Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about the Site from our Members.

Changes and modifications

In the future, we may make changes or modifications to this Privacy Policy, without prior notice. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy on the site and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this Privacy Policy at any time, and you are encouraged to review it frequently. If we make material changes to this Privacy Policy, we will notify you here, by email or by means of a notice on the site prior to the change becoming effective. By your use of this Site, you agree to accept posting of a revised Privacy Policy electronically on our Site as actual notice to you. Any dispute over our Privacy Statement is subject to this notice. Your continued use of our Site and, if you are a member, your continued participation in the Platform, will indicate your agreement to such changes.

Applicability to past-users

Should you cease to be a member of the Platform, NSE will retain your information for regulatory compliance, internal record-keeping and other legal purposes for such period as may be required under law. However, we'd like to emphasize that we are just as committed to protecting the privacy of our former Members as we are our current Members. If you choose to become an inactive Member, your Personal Information will continue to be protected by the privacy policies and principles described in the version of this Policy in force and effect at the time.

Applicable law

The Site is controlled by us from India; accordingly, this Privacy Policy, and our collection, use and disclosure of your information, is governed by Indian law, and not by the laws of any country, territory or jurisdiction other than India. We do not represent or warrant that the Site, or any functionality or feature thereof, is appropriate or available for use in any particular jurisdiction. Those who choose to download, access or use the Site do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. By downloading, accessing, using or submitting any information to the Site, users of the Platform or the Site from outside India acknowledge that the Site is subject to Indian law, and consent to the transfer of their information to India, which may provide a different level of

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data security than in their country of residence, and waive any claims that may arise under their own national laws.

Dispute Resolution

If any dispute arises between NSE and you in connection with or arising out of the validity, interpretation, implementation or alleged breach of any provision of the Policy, such dispute shall be finally resolved in accordance with the dispute resolution terms specified in the Terms and Conditions. The governing law shall be the laws as applicable in India.

Severability

We have made every effort to ensure that this Policy adheres with the applicable laws. The invalidity or unenforceability of any part of this Policy shall not prejudice or affect the validity or enforceability of the remainder of this Policy.

No waiver

The rights and remedies of available under this Policy may be exercised as often as necessary and are cumulative and not exclusive of rights or remedies provided by law. It may be waived only in writing. Delay in exercising or non-exercise of any such right or remedy does not constitute a waiver of that right or remedy, or any other right or remedy.