

Privacy Policy for Users

FnO India Securities Private Limited (“**FnO India**”) has a registration certificate from Securities and Exchange Board of India (“SEBI”) as a stock broker/trading member/clearing member and operates a trading software platform (“Trading Platform”) to facilitate trading of stocks and securities on a recognised stock exchanges whereas FnO Pte. Ltd (**together called “FnO”** or “**We**” or “**our**”) is in the business of developing, maintaining and providing trading software and is an owner and operator of a demo software solutions platform (“Demo Platform”).

All visitors of the Trading Platform and Demo Platform (“Platforms”) are together termed as “**you**” or “**Users**”.

We desire a long-term relationship with you and respect the trust that you place in us while you interact with us. In keeping with the requirements of applicable law, including Section 43A of the Information Technology Act, 2000, Rule 4 of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Information) Rules, 2011 (the “**SPI Rules**”) and Rule 3(1) of the Information Technology (Intermediaries Guidelines) Rules, 2011, this comprehensive privacy policy has been prepared to outline everything you need to know about the kind of information collected by us from you about you, our commitment to protecting such information in the course of our interaction with you and the conditions under which we may have to disclose such information (“Privacy Policy”).

By visiting the Platform you agree to be bound by the terms and conditions of this Privacy Policy and Terms of Use into which the Privacy Policy is incorporated by reference; and consent to our use and disclosure of your personal information, including sensitive personal information as defined under applicable law, in accordance with this Privacy Policy and applicable law. If you do not agree with the terms of this Privacy Policy please do not use or access our Platform. This Privacy Policy is incorporated into and subject to the Terms of Use. Any capitalized term used but not defined in this Privacy Policy shall have the meaning specified in the Terms of Use.

If you use the Demo Platform on behalf of a third party, you represent that you are authorised to accept the terms of this Privacy Policy on such person’s behalf.

FnO may update this Privacy Policy at any time, with or without advance notice. FnO reserves its right to bring about changes or to remove any features/functions of the Platform due to changes in government regulations and other local laws applicable. In the event there are significant changes in the way FnO treats User’s personally identifiable information, FnO will display a notice on the Platform. Notwithstanding the above, FnO shall not be required to notify the Users of any changes made to the Privacy Policy. To make sure you are aware of any changes, please review this Privacy Policy periodically.

Collection, use and disclosure of your personal information

“Personal information” is defined under the SPI Rules to mean any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

The SPI Rules further define “sensitive personal data or information” of a person to mean personal information about that person relating to:

- (i) passwords;
- (ii) financial information such as bank account or credit card or debit card or other payment instrument details ;
- (iii) physical, physiological and mental health condition;
- (iv) sexual orientation;
- (v) medical records and history;
- (vi) biometric information;
- (vii) any detail relating to the above as provided to body corporate for providing service; and
- (viii) any of the information received above by a body corporate for processing, whether stored or processed under lawful contract or otherwise:

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of the SPI rules.

When you use or transact on our Platform, we collect Personal Information about you periodically. We do need some personal information that is essential in order for you to access services through our Platform.

In general, you can browse the Platform without telling us who you are or revealing any personal information about yourself. Once you give us your personal information, you are not anonymous to us. Where possible, we indicate which fields are required and which fields are optional. You always have the option to not provide information by choosing not to use a particular service or feature on the Platform. We may automatically track certain information about you based upon your behaviour on our Platform. We use this information to do internal research on our users' demographics, interests, and behaviour to better understand, protect and serve our users. This information is compiled and analysed on an aggregated basis. This information may include the URL that you just came from (whether this URL is on our Platform or not), which URL you next go to (whether this URL is on our Platform or not), your computer browser information, and your IP address. FnO may share some of the aggregate findings (not the specific data) in anonymized

form with advertisers, sponsors, investors, strategic partners, and others in order to help grow its business.

If you choose to use the Platform, you consent to collection by us of information about your trading behaviour.

If you transact with us, we collect some additional information, such as a billing address, mode of payment, telephone and email address.

If you choose to post messages on our message boards, chat rooms or other message areas or leave feedback, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If you send us personal 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 such information into a file specific to you.

In our efforts to continually improve our product and service offerings, we collect and analyse demographic and profile data about our users' activity on our Platform.

We identify and use your IP address to help diagnose problems with our server, and to administer our 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 contact information and demographic information (like zip code, age, or income level). We use this data to tailor your experience at our 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 resolve disputes; troubleshoot problems; help promote a safe service; inform you about services and updates; customize your experience; detect and protect us against error, fraud and other criminal activity; enforce our terms and conditions; and as otherwise described to you at the time of collection.

All your information is maintained by us in electronic form on its equipment, and on the equipment of our employees. User information may also be converted to physical form from time to time. We make all User information accessible to its employees only on a need-to-know basis, and bind all such employees to strict confidentiality obligations.

Notwithstanding the above, FnO shall not be responsible for any breach of security or for any actions of any third parties that receive Users' personal data or events that are beyond the reasonable control of FnO including, acts of government, computer hacking, unauthorised access

to computer data and storage devices, computer crashes, breach of security and encryption, poor quality of internet service or telephone service etc.

Cookies

We use data collection devices such as "cookies" on certain pages of the Platform to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. "Cookies" are small files placed on your hard drive that assist us in providing our services. A "cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser. Cookies are useful for enabling the browser to remember information specific to a given user. We place both permanent and temporary cookies in your computer's hard drive. In the course of serving advertisements or optimizing services to its Users, FnO may allow authorized third parties to place or recognize a unique cookie on the User's browser. The cookies do not contain any of your personally identifiable information.

We offer certain features that are only available through the use of a "cookie". We also use cookies to allow you to enter your password less frequently during a session. Cookies can also help us provide information that is targeted to your interests. 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 browser permits, although in that case you may not be able to use certain features on the Platform and you may be required to re-enter your password more frequently during a session.

Additionally, you may encounter "cookies" or other similar devices on certain pages of the Platform that are placed by third parties. We do not control the use of cookies by third parties.

Disclosure

FnO will not disclose any personal information or data to governmental institutions or authorities unless such disclosure is requisitioned under any Indian law or judicial decree or when FnO, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the Terms of Use.

Choice/Opt-Out

We use personal information to provide the services you request. To the extent we use your personal information to market to you, we will provide you the ability to opt-out of such uses. We provide all users with the opportunity to opt-out of receiving non-essential (promotional, marketing-related) communications from us on behalf of our partners, and from us in general, after setting up an account.

Links to Other Sites

Our Platform may link you to other websites and platforms that may collect personally identifiable information about you as well as sensitive personal data. FnO is not responsible for the privacy practices or the content of those linked websites and platforms.

Security Precautions

Our Platform has stringent security measures in place to protect the loss, misuse, and alteration of the information under our control. Whenever you change or access your account information, we offer the use of a secure server. Once your information is in our possession, we adhere to strict security guidelines, protecting it against unauthorized access.

Your Consent

By using the Platform and/ or by providing your information to us, you consent to the collection and use of the information you disclose on the Platform in accordance with this Privacy Policy and Terms of Use.

If we decide to change this Privacy Policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

Grievance Officer

In accordance with Information Technology Act 2000 and rules made there under, the name and contact details of the Grievance Officer are provided below:

Mr. Thomas Joseph

Address: 704, Chrysalis, Irla, Qutbi CHS Ltd, Plot No 9/6, JVPD Scheme, Vile Parle (W)
Mumbai City, Maharashtra, India 400049

Email: support@fno.co