

PRIVACY NOTICE

In the course of using the website, mobile applications or any other online platform (“**Online Platform**”) either for availing the products and services or otherwise, ICICI Prudential Asset Management Company Limited (hereinafter “**ICICI Pru AMC/ We/ Us**”) and its affiliates may become privy to the personal information of those who use its Online Platform, including its investors, vendors, distributors (hereinafter “**Provider of Information/ Provider**”), including information that is of a confidential nature.

Data Protection Legislation means on or after 25 May 2018, the EU General Data Protection Regulation 2016/679 (“**GDPR**”); together with all other applicable and national implementing legislation relating to privacy or data protection; and where we use the terms “**personal data**”, “**data subject**”, “**controller**”, “**processor**” and “**process**” (and its derivatives), such terms shall have the meanings given to them in the Data Protection Legislation.

We collect and process your personal data provided by you through application forms, our website, face-to-face and any electronic communication in order to provide our service or service related information to you. It is hereby clarified that the Provider shall not be covered by this Privacy Notice, if he accesses any third party links from the Online Platform of ICICI Pru AMC.

For utilizing the services provided by Us either accessing the Online Platform 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 may include information that is of 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 (“**Personal Information**”)

Collection of Personal Information:

The personal data which we collect/obtain and use and covered under this privacy notice shall include full Name, address, telephone number(s), E-Mail Address, IP Addresses, cookies (COOKIES policy [Click Here](#)) and any other information defined in clause 3 of the Information and technology (Reasonable Security Practices and Procedures and Sensitive Personal Data and Information) Rules 2011, as maybe required by Us from time to time in order to provide services to you. Additionally, we may obtain the Personal Information from third-parties, or through call recordings at our call centers, internet technology or any other mode of information. Such Personal Information may 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. However, it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described below is applicable.

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.

Legal Basis

We are permitted to process your personal data in compliance with Data Protection Legislation by relying on one or more of the lawful grounds (i) You have explicitly agreed to us processing such

information for a specific reason; (ii) The processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you; (iii) The processing is necessary for the purpose of compliance with a legal obligation we have; (iv) to provide services to you; (v) to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes and to verify your identity in order to protect our business and to comply with laws that apply to us and/or where such processing is a contractual requirement of the services or financing you have requested; (vi) to evaluate, develop or improve our services; (vii) to keep our customers informed about their investments, unless you have indicated at any time that you do not wish us to do so.

Purpose

We and our affiliates including RTA (Registrar and Transfer Agent) may use your information for the purpose as mentioned in clause above and/or for the below legal basis: (i) to provide and manage your portfolio(s) and our relationship with you; (ii) to give you statements of your portfolio(s) and about our relationship with you; (iii) to entertain your enquiries and complaints; (iv) to help you manage your account, meet our regulatory obligations and/or requirements, to keep you informed about the product and service you hold with us; (v) to assess any application you make, including carrying out anti- fraud, suspicious transactions check and any other regulatory checks; (vi) To share your information with our partners and service providers.

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.

ICICI Pru AMC endeavors 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.

Disclosure of Personal Information:

We keep all the Personal Information confidential. However, in order to provide your service, we may share any information with our group companies their support service providers, wherever located. To provide your service(s), your Personal Information will be processed internally and externally by third Parties. We use third parties for [administrative, servicing, monitoring and storage of your data]. We will outsource some services to third parties whom we consider capable of performing the required processing activities so that there is no reduction in the service standard provided to you by us. Recipient of your information may be (i) any tax authority, if obligated to do so under applicable law; (ii) any statutory, regulatory, judicial authority and/or body, law enforcement agencies, prevention agencies, whether Indian or overseas; (iv) any third party, as long as they use for the same purpose as it was originally given to us by you for the services.

Sharing of Personal Information with Third Parties:

To the extent required or permitted under law, we may share your Personal Information for the uses mentioned herein; (i) 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 who are remunerated for the services rendered; (ii) Financial Advisors or sub-brokers or intermediaries through whom applications are received and whose details are provided on the application form/ transaction slip(s) or any other service request; (iii) Any other organization for verifying the identity of investors for complying with anti-money laundering requirements; (iv) 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 shared to any of the third parties, including mentioned above, on need to know basis.

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:

We and other members of our group may use your information from time to time to inform you by letter, telephone, text (or similar) messages, email or other electronic means, about similar services which may be of interest to you or them.

You may, at any time, request that we cease or do not send such information by one, some or all channels, by contacting us using the contact details set out below.

Retention and removal of Personal Information:

We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. We will normally destroy or erase data after statutory timelines lapse. However, we may retain your information, or information relating to your account after you cease to be a customer for longer than this, provided it is necessary for legal, regulatory, fraud prevention or other legitimate business purpose.

Breach of Internet Security:

In addition to the efforts of ICICI Pru AMC for the protection of the Personal Information, it is important that the Provider of Information should co-operate with ICICI Pru 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 unauthorized 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., ICICI Prudential Mutual Fund, ICICI Pru AMC, ICICI Prudential Trustee Company Limited, directors, officers, employees or affiliates' will not be responsible.

Your Rights

Under certain circumstances, you will have the right to (i) be informed about the processing of your personal data (purpose, recipients, storage period etc.); (ii) object to your personal data being processed for a particular purpose; (iii) Withdraw, at any time, any consent that you have previously given to us for our use of your personal data; (iv) Ask us to stop or start sending you marketing messages at any time; (v) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us; (vi) Request the erasure of

your personal data. This enables you to ask us to delete or remove personal data where you think that we do not have the right to process it.

If you would want to contact us in relation to any of the rights set out herein, please contact us using the following details. To protect your privacy and security reasons, we may take reasonable information to verify your identity before providing you the required information.

Mr. Shiju Thomas, Email-privacy@icicipruamc.com, Data Protection Officer, ICICI Prudential Asset Management Company Limited, 2nd Floor, Block B2, Nirlon Knowledge Park, Western Express Highway, Goregaon (E), Mumbai- 400063

Cookie Policy:

ICICI Prudential may use "cookies" in connection with operation of its web sites. If you visit portions of AMC's web sites, cookies will be placed on your device, which may include or be linked to personally identifiable data. Cookies are small pieces of information that are stored on your computer by the AMC's web site server. Cookies are used for record-keeping purposes: the stored information can be retrieved by the AMC's web site server when you return to the web site. This allows AMC to personalize or regulate the use of the site, and also permits AMC to automate the access and data-entry functions of the site (e.g., login information), to tailor the appearance or presentation of the site to your preferences or interests. In general, we do not use cookies to track the navigational habits of identified users without the user's consent. If you visit our sites only to read or download content, much of the information we do collect is statistical only (e.g., the domain from which you access the website, the date and time you access our site) and not personally identifiable. We use cookies to personalize your experience with the most relevant information presented to you up front, thereby improving your overall experience

You may wish to adjust your Web browser to inform you whenever a cookie is to be used, or to reject all cookies automatically. However, if you elect not to accept cookies, some or all parts of the web site may not function properly or permit access.

In nearly all cases, the above described data may be collected or processed by, and transferred to; AMC's facilities in the countries where AMC does business the data may then be subject to the legal systems of those countries. This may be done through the site's Internet Service Provider (ISP) or through the use of such tools as Google Analytics. This information is gathered to improve the quality of our services and our ability to market those products and services to specific individuals and organizations that could benefit from them.

Web Analytics

The website ("www.icicipruamc.com") and a web analytics service (which may be used by Us) uses cookies to help the Website operators analyze 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.

This Privacy Notice

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. Any changes we may make to this Privacy Notice in the future will be posted on this page and where appropriate, notified to you by email.