

**Document Reference No: IDBIAML/IPPP**



**IDBI Asset  
Management Limited  
(IDBIAML)**

PRIVACY POLICY & PROCEDURE

Name of the Document	Privacy Policy & Procedure
Document Number/ID	IDBIAML/IPPP

### Version History

Sr. no.	Version Date	Ver. No.	Description of Change	Prepared by	Reviewed by	Approved By
1	12/10/2020	V 1.0	New Version	IIL Security Team	IT Head	AML Board
2	22/09/2022	V 2.0	Review	IIL Security Team	IT Head	

## **Privacy Policy & Procedure**

### **Preamble:**

In the current environment, there is an expectation among various investors and customer communities about safe guards related to data privacy. On 24th August 2017, the Supreme Court of India, in a historic judgment, declared the right to privacy as a fundamental right protected under the Indian Constitution. Accordingly, maintaining privacy of customer's information recorded in the Company and using the same only for its purposes and activities and as communicated to the customer is an important requirement which has to be adhered to. In context of above, the Company has framed a Data Privacy policy as documented herein which is aimed at serving these objectives and purposes. The policy seeks to protect customers' personal information as documented herein and sets up a governance structure to manage customer information through its lifecycle.

### **Scope:**

The policy seeks to cover customer information collected during onboarding and subsequently updated at periodical intervals based on customer authorization.

### **Objective:**

- It states the Company's policy on managing customers' personal information with confidentiality in a transparent manner.
- Ensure stakeholders are aware on the information that needs to be protected.
- Wherever required, proper authorization is obtained from customers/ prospective customers.

### **Applicability:**

- Covers all entities that intend and or obtain product and related services from the Company.
- Covers all channels through which the customer has shared information including electronic devices, web browsers, social media, physical forms, etc.
- Covers data in isolated or aggregated or intelligent manner using various methods including statistical, machine language, etc. Such aggregated data would include information of exited customers.
- Any disclosure of information to regulatory or other law enforcement authorities would not be considered as failure to abide with this policy. Any information freely available under public domain or legally authorized to be shared would be excluded for the purposes of this policy.
- Covers customers that have been on boarded and deals with the Company.

**Definitions:**

- Life cycle consist of end to end interaction with the customer from enquiry stage till interaction with the customer is formally closed.
- Information includes customer specific data such as customer ID, password, financial details, contact details, transaction details as well as demographic information, know your customer related documents/information, promotion details. Information includes data in aggregated manner and derived information thereon. All of such information would be considered as personal information for the purposes of this policy.
- Correctness and or validity: All information recorded and or derived based on customer authorization would be considered as valid and or correct information provided with customer consent and The Company would record them as provided.
- Unauthorized usage would mean disclosure of above information to any unauthorized entity without explicit approval.

**Governance:**

- The Company has Technology Committee which will oversee the compliance of the privacy policy.

**Processing**

- Data from the customer would be obtained through various channels and recorded /maintained in physical and or electronic form from onboarding till closure of relationship. Such data would consist of static data such as demographic information and dynamic data such as transaction details.
- Information would be recorded and or stored under control of the company once handed over to its authorized personnel or consent given electronically. Such recording and storage could be in physical form e.g. copy of identity document or electronic e.g. scanned copy.
- The Company as a process maintains regular information with backups to ensure recovery from any disaster.
- The Company has a system of giving access rights to its personnel or affiliates or agencies and information would be made available as per such access rights for all of above process, Customer would also be given access rights to view their own personal information/transact and any failure thereon would be responsibility of the customer.

**Controls:**

- The Company has process and control to ensure abidance with access controls, information security abidance, HR policies, disaster and business continuity plan and robust process documentation and controls. These are enabled with checker and exception handling and regular audit review.
- The Company has robust technical controls to reduce likelihood of data leakage.
- The Company will take reasonable steps including security controls to protect privacy of the customer towards reducing likelihood of inadvertent disclosure of Information.

**Management of Information:**

- Data will be stored in encrypted or masked form as applicable depending on nature of information e.g. password, mobile number, email ID.
- Each type of information will have access controls for recording, modifying, deleting and purging. Further any such access by maker or checker will be recorded and sample logs (randomly selected using robust statistical methods) maintained for audit purposes.

All employees of IDBI AMC are required to comply with all necessary guidelines/procedures / control measures mentioned in this Privacy Policy and are also required to maintain confidentiality in data pertaining to their Functions/Roles.

**Disclosure:**

- The Company's privacy policy with applicable content will be suitably communicated to customers on the website.
- The Customer will be informed about the reason for data collection as part of its terms and conditions.
- Specific queries about usage of data will be shared as and when sought, subject to approval by senior management.

**Ownership and Review:**

- The Privacy Policy shall be reviewed annually.