

## Privacy Policy

Buglerock Capital Private Limited, in its capacity as a SEBI-registered Portfolio Manager, is committed to safeguarding the confidentiality, integrity, and security of personal information of its existing and prospective clients. This Privacy Policy outlines our data collection, usage, and disclosure practices.

### 1. Commitment to Privacy:

We acknowledge that the personal and sensitive information you provide to us is shared in good faith and with the expectation that it will be protected with the highest degree of care. We recognize our responsibility to ensure the confidentiality, security, and lawful use of such information.

### 2. Information Collection

Buglerock Capital Private Limited collects personal information from users at various interaction points on its website and related platforms. The Company is the sole owner of the information collected through its official website and subdomains.

### 3. Purpose of Information Collection

We are dedicated to protecting your personal information and use it only in compliance with applicable legal and regulatory requirements. Personal information is used for the following purposes:

- Account Servicing and Maintenance: To manage, maintain, and secure your account.
- Transaction Processing: To execute transactions and maintain trading records.
- Customer Support: To respond to client inquiries and provide customer service.
- Product Development and Offerings: To develop, offer, and enhance our products and services.
- Legal Compliance: To comply with statutory, regulatory, or legal obligations.

### 4. Sources of Personal Information

We may collect personal and sensitive information from the following sources:

- Directly from You: Via applications, forms, or information shared during onboarding (e.g., name, address, PAN, Aadhaar, KYC, KRA, CKYC, DigiLocker details, date of birth, financial information, and investment preferences).
- Account Transactions: Trading history, account balances, and related financial records.
- Customer Interactions: Communications with customer service teams or entries made on our websites.
- Credit Reporting Agencies: For creditworthiness assessments related to margin-based products.
- Third-Party Data Providers: To verify identity, perform due diligence, or understand client needs.
- Client Preferences: Based on chosen service features such as electronic statement delivery or customized website preferences.
- Authorized Transfers: Information shared with client consent from other financial institutions.

## **5. Use of Personal Information:**

We may use your Personal Information for the following purposes:

- **Service Fulfillment:** To provide, manage, and improve our products and services;
- **Account Management:** To maintain your accounts, execute transactions, and provide investment updates;
- **Communication:** To send administrative notifications, product announcements, and promotional offers;
- **Compliance and Legal Requirements:** To comply with applicable laws, regulations, and legal processes;
- **Risk Management:** For security, fraud detection, and due diligence purposes.

## **6. Client Communications**

We provide service updates, notifications, and announcements through various communication channels, including emails, app notifications, and website updates. Clients can manage their communication preferences after logging into their accounts.

## **7. Legal Disclosure**

We are committed to preserving client privacy but may disclose personal information under the following circumstances:

- **Legal Compliance:** If required by law, regulation, judicial proceedings, or a valid court order.
- **Exceptional Situations:** In good faith, to prevent threats to public safety or address suspected illegal activities.

We employ robust data security measures to safeguard personal information but cannot be held responsible for data breaches caused by cyberattacks or other unlawful activities.

## **8. Data Sharing with Third-Party Service Providers**

We may share personal information with third-party service providers such as custodians, fund accountants, brokers, IT service providers, and other entities essential to delivering our services. Such data sharing is conducted in compliance with confidentiality obligations and is limited to service-related requirements.

## **9. Data Security:**

We adopt reasonable technical, administrative, and physical safeguards to protect Personal Information from unauthorized access, misuse, or disclosure. These measures include, but are not limited to:

- Secure access controls and encryption;
- Regular audits and data security reviews;
- Restricted data access on a need-to-know basis.

## **10. External Website Links**

Our website does not link to third-party websites. We are not responsible for the privacy practices of external sites, and this policy applies solely to our official website and its subdomains.

### **11. User Responsibilities:**

You are responsible for maintaining the confidentiality of your login credentials. We advise you to:

- Use strong passwords and update them regularly;
- Avoid sharing login details with anyone;
- Notify us immediately in case of suspected unauthorized access.

### **12. Internet Risks:**

While we implement industry-standard security measures, the open nature of the internet presents inherent risks. We cannot guarantee complete protection against data breaches and assume no liability for losses arising from internet-based risks.

### **13. Data Accuracy and Updates:**

We rely on you to provide accurate and complete information. You are encouraged to periodically update your Personal Information through our secure online platforms or by contacting us directly

### **14. Consent**

By using our website, you consent to the collection, use, and disclosure of your personal information in accordance with this Privacy Policy.

### **15. Amendments and Updates**

We reserve the right to amend this Privacy Policy at any time without prior notice. The updated policy will be published on our website, and continued use of our services constitutes acceptance of the revised terms.

### **16. No Contractual Rights:**

This Privacy Policy is intended to provide transparency and does not create enforceable legal rights in or on behalf of any party.