

# PRIVACY POLICY



**SEBI REG. NO. INZ000203537**  
**CDSL DP ID: IN-DP-184-2016**  
**BSE TM: 6374 | NSE TM: 90384**

**Scope:** This Privacy Policy applies to all personal and account data collected or processed by Hardik Fintrade Pvt. Ltd. in the course of providing broking, and depository-related services.

## 1. What information we collect

We collect the information necessary to open, service and maintain trading / demat / mutual fund accounts, and for regulatory compliance, including:

- Identity data (name, PAN, Aadhaar where permitted, date of birth).
  - Contact details (address, email, phone).
  - Financial & transactional data (bank account, payment/transaction history, order details, holdings).
  - KYC, FATCA/CRS & compliance documents.
  - Device, IP, login and transactional metadata for online access.
  - Communications (calls, emails, chat transcripts) when recorded for service/monitoring. (Processing is limited to what is necessary for account servicing, AML/KYC, statutory reporting and regulatory obligations.)
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## 2. Legal basis & purpose for processing

We process personal data to:

- Comply with SEBI, exchanges, depositories and other statutory requirements (KYC, AML, reporting).
- Provide brokerage, order execution, custody, settlement and related services.
- Verify identity, prevent fraud, and manage risk.
- Communicate service information, disclosures, policy updates and transactional alerts.
- Maintain records as required by law and regulators.

**Regulatory basis:** our processing is required for compliance with laws/regulations applicable to intermediaries regulated by SEBI and the exchanges. (See SEBI CSCRF and data-sharing guidance cited below.)

### **3. Sharing of information**

We may share client information with:

- Regulators & statutory authorities (SEBI, RBI, tax authorities) as required.
- Exchanges / Clearing Corporations / Depositories / RTAs / AMCs / Banks for mandate validation, order settlement, allotment, and record-keeping.
- Third-party service providers (payment processors, cloud providers, IT vendors, KYC vendors, audit firms) who process data on our behalf under contract.
- Legal / compliance advisors when required.

We will not sell personal data to third parties. Whenever third parties process data for us they must comply with confidentiality and security obligations and our contractual standards. SEBI requires that regulated entities remain accountable for third-party services and confidentiality of data.

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### **4. Data security & cyber resilience**

We implement administrative, technical and physical safeguards proportionate to the risk, access controls, audit logs, vulnerability management, periodic cyber audits and incident response procedures. We follow the Cyber security & Cyber Resilience Framework (CSCRF) and related SEBI/exchange audit and incident reporting requirements. This includes periodic cyber audits and timely reporting of incidents to exchanges / SEBI as per applicable circulars.

## 5. Retention

We will retain personal data as long as necessary to fulfill the purpose for which it was collected and to comply with regulatory record-retention requirements. Thereafter data will be securely deleted or anonymised in line with statutory timelines and internal retention schedules.

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## 6. Client rights & requests

Clients may:

- Request access to their personal data we hold.
  - Request correction of inaccurate data.
  - Request deletion where there is no legal/regulatory basis to retain the data. Requests must be sent to **hardikfin@hardikgroup.com** and we will respond within a reasonable period subject to regulatory constraints (some data cannot be deleted due to statutory retention obligations).
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## 7. Third parties, outsourcing & accountability

We remain fully accountable for the protection of client data when outsourced vendors or cloud providers process data on our behalf. Contracts with service providers require appropriate confidentiality, security measures and audit rights in line with SEBI guidance and FAQs

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## 8. Incident reporting & escalation

In line with SEBI and exchange rules, we maintain an incident response plan and will report reportable cyber incidents to the relevant exchanges/depository/SEBI within the timelines prescribed in the applicable circulars. We will notify affected clients as required under law and based on the severity of the incident.

## **9. Links & third-party sites**

Our systems may link to third-party sites (exchanges, AMCs, RTAs). We are not responsible for the privacy practices of such third parties; clients should review their privacy policies.

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## **10. Changes to this policy**

We may update this policy to reflect legal/regulatory changes or improvements in our practices. Material changes will be communicated to clients via email and posted on our website.

### **Subject to Change**

**This Privacy Policy is subject to change and may be updated or revised from time to time, without any prior notification to the User, at the sole discretion of Hardik Fin Trade Private Limited. It is the responsibility of the User to periodically review the Privacy Policy to determine whether there have been any revisions or updates. The last updated date of the Policy has been mentioned above for the reference of the User.**

**If you do not agree with the terms of this Privacy Policy or any changes made to this Policy, please stop using all products and services provided by Hardik Fin Trade Private Limited immediately and write to us at email ID mentioned on our website.**