

CAPITALMIND ASSET MANAGEMENT PRIVATE LIMITED

Privacy Policy

CAPITALMIND MUTUAL FUND

Title	:	Privacy Policy
DOC ID	:	
Document Classification		Public (to be on the website of AMC)
Policy Owner	:	Head of Information Technology
Policy Administrator	:	Head of Information Technology
Policy Adherence by	:	Respective Departments
Release Date	:	
Last Date of Update	:	
Version Number	:	2.0
Reviewed By	:	CEO
Approved By	:	This version is approved by the Board of Directors of Capitalmind Asset Management Private Limited in its meeting held on 28 th June 2025.
Propriety	:	This document is the sole property of Capitalmind Asset Management Private Limited. Any use or duplication of this document without express permission of Capitalmind Asset Management Private Limited is strictly forbidden and illegal.

Policy Version Control

Sr No	Version Number	Version Date	Summary of changes
1	1.0	15 Apr 2025	Formulation of the policy in accordance with SEBI circulars
2	2.0	28 June 2025	Revision of policy to include clauses as per Master Circular & CSCRF

Table of Contents

1. Background.....	6
2. Information covered under the policy	7
2.1. Personal Information.....	7
2.2. User Data.....	7
3. Purpose and use of collecting the information	8
4. Processing the Information.....	10
5. Connecting with Capitalmind Mutual Fund via Social Media	11
6. Sharing of Personal Information.....	11
7. Security Measures:	14
7.1. Breach of Internet Security	14
7.2. Third Party data provided by the user	14
7.3. Third Party Websites.....	15
7.4. Retention of Information.....	15
8. Changes To This Privacy Policy	15
9. Your Acceptance of the terms of the policy and Rights thereof,	16
10. Contacting Us / Grievance Redressal	16

List of Abbreviations & Definitions

AMC	Capitalmind Asset Management Company
Trustee	Capitalmind Trustee Private Limited
Mutual Fund	Capitalmind Mutual Fund
Users	Current or Prospective investors / customers / clients of Capitalmind AMC
Data	representation of information, facts, concepts, opinions or instructions in a manner suitable for communication, interpretation or processing by human beings or by automated means;
DPDP Act	The Digital Personal Data Protection Act, 2023 and the rules issued under the Act from time to time
SEBI	The Securities and Exchange Board of India
AMFI	The Association of Mutual Funds in India
CSCRF	Cyber Security and Cyber Resilience Framework, as mandated by SEBI
Child	Any person below the age of 18 years

Interpretation

- The terms as may be used in this policy would be in accordance with the following legislations
 - 1) “The Information Technology Act 2000 as amended till date, Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011” and such other rules/regulations and Circulars as may be applicable.
 - 2) Digital Personal Data Protection (DPDP) Act, 2023
- All references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa. All references to client/customer/investor whether masculine or feminine include references to non-individuals also unless repugnant to the context thereof;
- Any reference to any statute or statutory provision shall be construed as including a reference to any statutory modifications or re-enactment therein from time to time;
- Headings are for ease of reference only.

References:

- AMFI Best Practice Guidelines Circular No.99 /2021-22 dated March 29, 2022

1. Background

Capitalmind Asset Management Company (Capitalmind AMC or AMC) is a Company incorporated under the Companies Act, 2013, has been appointed as the Investment Manager to the Schemes of Capitalmind Mutual Fund ("Mutual Fund"), a mutual fund registered with Securities and Exchange Board of India ("SEBI"). Capitalmind Trustee Private Limited ("Trustee Company" or "Trustee") is the Trustee to the Mutual Fund. Capitalmind Financial Services Private Limited ("CFSPL") is the sponsor of the Mutual Fund ("Sponsor")

Capitalmind AMC either directly (through capitalmindmf.com website, web app or other applications) and its related social media accounts (collectively, the "Sites") or through third party service providers engaged by the AMC (Service Providers) such as the Registrar and Transfer agents collects, receives, possesses, stores, deals or handles information received from investors / client / customers whether existing or prospective.

This Privacy Policy governs the collection of information including a) personal information or sensitive personal data of current or prospective investors / clients / customers b) visitors of website (<https://www.capitalmindmf.com>) products, services and software and c) such other persons who intend to enter into any kind of relationship with the AMC (each such person is hereinafter referred to as Information Provider / User / "You" / "Your")

Further, the policy specifies the uses, maintains, stores, shares and discloses regarding the information collected from each User.

2. Information covered under the policy

2.1. Personal Information

Personal Information refers to any data about an individual who is identifiable by or in relation to such data. Such information that can be personal and sensitive in nature. At times, and to allow Capitalmind AMC to do its job, Capitalmind AMC may receive identifiable personal information for those purposes outlined in its agreements with customers. An indicative list given below:

- Name, residential address office address, age, gender, mobile or telephone number, email id, fax numbers etc.;
- Bank Account details change of bank account details or registration of multiple bank accounts etc. through application forms
- Permanent Account Number details
- Payment instrument details at the time of submitting application at the time of investment or as proof for carrying out change of bank account or any other details of debit card obtained (if any)
- Generation and storing password (PIN) in encrypted form based on the request from the investor under the online mode of investments
- KYC Documents
- Biometric information obtained, if any;
- Demat Account details like beneficiary account no. etc;
- Annual Income and savings profile; and
- Third party data provided by the user including nominee and beneficiary details;
- Other information collected as may be considered as sensitive and personal

2.2. User Data

(i.e., data collected from visitors to Capitalmind AMC website, web app and any other application).

This includes browser-supplied information (including computer and technical information, site session information such as the sequence of pages visited during a visit to the Service, the average time spent, information searched for, access times etc.) and may be recorded for usage analysis and security monitoring.

When you visit our website or use our mobile application, we may use “cookies” and similar technologies to enhance your user experience. Cookies are small pieces of information that allows the AMC to place files on your device to store preferences and track activity. By using AMC website and agreeing to the terms of use, you consent to our use of cookies in accordance with the terms of our privacy policy. The visitor, including the Information Provider can refuse the use of cookies. The information generated by the cookie of the visitor’s use of the Website, may be stored with the AMC for operational purposes.

Further, it may be noted that Internet Protocol (IP) addresses, browser supplied information and site session information may be recorded as part of the normal operations and for security monitoring purposes. Should you wish to disable these cookies you may do so by changing the setting on your browser. However, you will be unable to access certain part(s) of our Site.

The AMC will collect personal data, which is *adequate, relevant and limited* to the stated purpose, and will annually review application / web forms to eliminate fields no longer required.

3. Purpose and use of collecting the information

- **Collection of Personal Information:** The AMC may collect /receive your Personal Information from several sources. You may provide Personal Information as part of the application or enrollment process.

(whether in writing or electronically). You agree and understand that your Personal Information shall be collected, processed, stored and used by us, and passed to, transmitted to and processed by our subsidiaries and/or affiliates and other data processor, agents or service providers acting under a contract with us for the purposes identified in this Privacy Policy.

- Personal information is being collected by the AMC to respond to your requests, to process the investment applications and to also ensure safe subscriptions / redemptions through points of acceptance in physical form, website, online portals and such other mode.
- The Personal Information enables us to provide investors/clients/customers with good, qualitative, timely and efficient service such as to be able to manage your portfolios, provide you information and/or statements regarding our portfolio(s), manage your queries and complaints.;
- To carry out an assessment of the applications and requests you place with us, and carry out an anti-fraud, suspicious activity check, or any other regulatory check which the AMC may be directed to do or is bound to do under applicable law;
- To share your information with our service providers and vendors.
- KYC documents
- To be compliant with the Know Your Client ("**KYC**") norms under the Prevention of Money Laundering Act, 2002, ("**PMLA**"), the rules issued thereunder, and guidelines and circular on Anti- Money Laundering issued by SEBI and SEBI (Mutual Funds) Regulations, 1996 as amended till date.
- We may also use the information shared by users to contact them regarding the products and services offered by us and seek feedback on the services provided.
- User data collected by Capitalmind AMC can be used for the following purposes:

- To run and operate our Site we may need your information to display content on the Site correctly.
- To improve customer service, the information you provide helps us respond to your customer service requests and support needs more efficiently.
- To personalize user experience, we may use information in the aggregate to understand how our Users as a group use the services and resources provided on our Site.
- To run a promotion, contest, survey, or other Site feature.
- To send Users information they agreed to receive about topics we think will be of interest to them.
- To send periodic emails
- To respond to inquiries, questions, and/or other requests.

4. Processing the Information

The AMC is permitted to collect, process and retain the Personal Information basis the following grounds:

- You have given your explicit consent for processing of the Personal Information by us;
- The processing of the data provided you is integral for the AMC to perform its duties and obligations under the contractual arrangements which it has entered into with you or the same is necessary qua any legal obligation that is applicable to us;
- Processing the data is required for a legitimate purpose pursued by us or a third party;
- Such information may also be used by us to generate statistics and reports and/or to protect and defend the rights, interest and property of the Mutual Fund, AMC, Trustee Company, Sponsor & its affiliates and directors and/or to enforce legal rights or provisions of the Scheme related Documents of the Mutual Fund viz. Scheme Information

Document (SID), Statement of Additional Information (SAI) and Key Information Memorandum (KIM);

- To continue to provide and improve our services to You;
- When the same is necessary for compliance of any applicable law;
- To prevent, detect, investigate any fraud or alleged fraud or instances of money laundering or any other such activity which is punishable under the applicable laws;

The AMC further declares that the Personal Information may be disclosed if the same is necessary to protect the legitimate interests and rights of the AMC, the Mutual Fund, the Trustee Company, the Sponsor and any other affiliate, to enforce our legal rights and be in compliance with any applicable law or under the directions of any court, tribunal, judicial/quasi-judicial and/or statutory authority.

5. Connecting with Capitalmind Mutual Fund via Social Media

The AMC will provide experiences on social media platforms that enable online sharing, communication and collaboration among users who have registered to use such platforms. The AMC may collect information you provide by interacting with us via social media, such as images, pictures, videos or other information. Any content you post, such as pictures, videos, information, opinions, or any personal information that you make available to other participants on these social platforms, is also subject to the terms of use and privacy policies of those platforms. Please refer to the respective platform policies to better understand your rights and obligations regarding such content.

6. Sharing of Personal Information

The AMC may share the Personal Information for the uses mentioned with the following third parties: affiliates, Registrar and Transfer Agents (as defined under the relevant SEBI guidelines), banks, custodians, depositories,

vendors, service providers, distributors or Sub-Brokers through whom application of investors are received for investment, attorneys, accountants, auditors, call centres, external third parties who are involved in clearing the transactions, any other organization for verifying the identity of investors for complying with anti-money laundering requirements, with intermediaries, Government authorities including but not limited to RBI and SEBI, whose ARN stamp appears on the application forms / transaction slips, post office, couriers and other intermediaries involved in any electronic transfer of information or monies, court, tribunal, judicial / quasi-judicial and/or statutory authority, arbitrators.

The AMC may share certain Personal Information with third parties such as post office, local and international courier and other intermediaries for correspondence with the investor and for making payments to the investor through Electronic Clearing Services (ECS), NEFT etc.

Personal Information shall be communicated to third persons only for reasons consistent with the purposes for which the data are originally collected or other purposes authorised by law.

The Information Provider expressly and unequivocally, gives their consent that the Personal Information may be used to produce statistics reports for internal as well external use, which may be forwarded to affiliates, intermediaries, successors, vendors, advertisers and also gives their consent for sharing of the Personal Information as highlighted above. Additionally, we shall reveal only such information to external authorities as may be found relevant and necessary in order to comply with the applicable laws and to third party service providers to ensure smooth functioning of the activities as may be prescribed under applicable laws and the use of the Personal Information will be communicated with the third parties for the reasons consistent with the purpose for which the Personal Information was originally taken.

By using our website or by agreeing to transact with us or sending inquiries , you expressly agree to terms of the privacy policy and above sharing of information . If users do not agree with the privacy policy, users are not granted permission to access or otherwise use this website.

We may also be required from time to time to disclose the Personal Information to governmental or judicial bodies or agencies or our regulators based on their requirement to comply with the applicable laws including cyber laws.

Electronic Newsletters: If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product, or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or User may contact us via our Site. We may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

AMC, its service providers/agents shall share data with any entity based on explicit unitholder consent as follows:

- i) Through the Account Aggregator* ecosystem as and when notified by SEBI.
- ii) Through any similar consent artefact as and when notified by SEBI.

** Account Aggregator is a consent manager for Financial Data: a new class of NBFC approved by RBI to manage consent for financial data sharing. It was created through an inter-regulatory decision by Reserve Bank of India (RBI), Securities and Exchange Board of India (SEBI), Insurance Regulatory and Development Authority (IRDAI), Pension Fund Regulatory and*

Development Authority (PFRDA) through Financial Stability and Development Council (FSDC). RBI licenses the AAs.)

7. Security Measures:

The AMC limits access to personal information to authorized firm employees or agents and, as described above in Sharing Personal Information, our service providers are held to stringent standards of privacy. We maintain physical, electronic and procedural safeguards to protect the information against loss, misuse, damage or modification and unauthorized access or disclosure.

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

7.1. Breach of Internet Security

Despite our efforts to protect the Personal Information, if any unauthorized person(s) breaches security and control measures (including site being hacked, presenting inaccurate information, loss of data etc), and illegally use such sensitive/personal data or information the AMC will strive to put in place corrective measures. However, the Mutual Fund, AMC, Trustee Company, Sponsor and its affiliates, directors, or employees shall not be held responsible/liable for the same.

7.2. Third Party data provided by the user

You might sometimes provide us personal information of others. Common scenarios include: providing nominee or beneficiary details for your investments, giving details of a joint account holder, or providing referee/contact information. If you give us personal data about another person, you must do so only with proper authority or consent from that person. By submitting such information, you confirm that you have the right

to do so. AMC will use and protect that third-party's information in accordance with this Policy just as we do for your own data.

Further, users are advised to share the guardian details in case the third party user is a minor.

7.3. Third Party Websites

Our website may contain links to third party websites or services that may collect personally identifiable information about you. The data protection practices of those websites linked to this Website are not covered by this Privacy Policy. Third-party sites are governed by their own privacy policies, and we do not have control over their content or practices. We encourage you to review the privacy policies of any external sites you visit. We will not be responsible for misuse of your information by any third-party website that you access via our site.

7.4. Retention of Information

The AMC may retain the Personal Information of the Information Provider for as long as required to provide the services or as otherwise required under law or establishment, exercise or defence of legal claims

8. Changes To This Privacy Policy

Capitalmind AMC reserves the right to amend / modify any sections of this policy from time to time to reflect changes in our practices, legal or regulatory requirements or any other purpose we may deem necessary. The Policy, as amended from time to time, will be available on the AMC Website.

We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting your information. Your continued relationship with us after any changes to this Policy will be deemed as acceptance of the updated terms, *except* in scenarios where explicit consent is required. If you do not agree with the changes, you retain the choice to discontinue use of our services.

9. Your Acceptance of the terms of the policy and Rights thereof,

Investors/clients/customers shall have expressly consented to the terms of this Policy if they enter and use this website or provide any information while transacting with us.

You have the right to request a copy of the personal data about you, which we hold, to have any inaccurate personal data corrected and to object to or restrict our using your personal data. You may also make a complaint if you have a concern about our handling of your personal data

10. Contacting Us / Grievance Redressal

Capitalmind AMC does not send or condone unsolicited email, or “spam”. We send email only to people who have requested our newsletter or asked for information about us. If you feel you’ve received unsolicited email from Capitalmind AMC, please send a message to privacy@capitalmindmf.com. We shall deal with the issue promptly. Email addresses found on this page do not accept consent to receive promotional email messages.

Any question, concern or complaint concerning our Privacy Policy, or any grievances relating to use or handling of your sensitive personal data may be brought to our notice by writing our email at privacy@capitalmindmf.com Please include your name, contact information, and a clear description of your issue. We will acknowledge receipt of your complaint/request and seek to resolve it as soon as possible.