# **Privacy Policy**

Madhu Bansal(Research Analyst) acknowledge and accept that the personal details that you impart to us, is to be kept in strict confidentiality and to use the information only in the manner which would be beneficial to our customers. We consider our relationship with you as invaluable and strive to respect and safeguard your right to privacy. Below are the word by word credentials of our Privacy Policy:

- By registering your mobile number on Madhu Bansal's website, you agree to be contacted by our support/sales team or to receive SMS's even if the subscribed mobile no. in DND registry (Do Not Disturb).
- By registering for our services, you also agree to comply with our Private Policy and Terms & Conditions.
- Please be aware that you may receive calls related to services promotions. In case there are any changes in your contact information that we retain, please bring this to our knowledge either by call or email.
- Your information whether public or private, will not be sold, rented, exchanged, transferred or given to any company/establishment/individual for any reason, without your consent for the same.
- Your information will be used ONLY for providing the services to you for which you have subscribed to us. For which you have shared your respective information.

### 1. TERMS USED IN THIS POLICY

# In this Policy:

"Cookies" mean small files that are placed on your computer, mobile device or any other device by a website, containing, among other information, the details of your browsing history on that website.

"Personal Data" means any information relating to an identified or identifiable natural person.

"Policy" means this Privacy Policy.

"Service" means a service that we provide for a fee or gratis. You are using our Service when you sign up or sign in to get access to any Service provided by us.

"we", "us", "our", and "MADHU BANSAL(INH000010672)" refer to MADHU BANSAL(INH000010672)

"MADHU BANSAL(INH000010672)" means the set of proprietary APIs, SDKs, tools, plugins, code, technology, content, and services that are made available over the thefinbergadvisory.comand includes the microsites created therefrom and its mobile application (including microsites created on third-party websites).

"Website" refers to **thefinbergadvisory.com**, you are using our website when you are visiting our website.

"you" refers to you, as a visitor to the Website, as a user or subscriber of the Services.

MADHU BANSAL(INH000010672) is a SEBI-registered entity and it does issue research reports or make recommendations.

### **ABOUT THIS POLICY**

We understand the importance of data and its privacy. This Policy explains the type of information we collect, how we handle your information and comply with the requirements of applicable privacy laws. Your subscription to our Services whether over the MADHU BANSAL(INH000010672) or over any third-party technology will be covered by the terms of this Privacy Policy.

This Privacy Policy is applicable to any person who visits, inquiries or avails our Services whether using the MADHU BANSAL(INH000010672) or any third-party site where our Services are offered. You may take note that information and privacy practices of our business partners, advertisers, sponsors or other sites to which we provide hyperlink(s), may be materially different from this privacy policy. We recommended that you review the privacy statements and policies of any such third parties with whom they interact. We do not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites, nor do we guarantee the accuracy, integrity, or quality of the information and content available on such websites. Their inclusion or exclusion on the MADHU BANSAL(INH000010672) does not imply our endorsement.

This Policy is implemented in conjunction with the Terms of Service, Cookie Policy and Disclaimers and such other policy/ document as available by MADHU BANSAL(INH000010672) and the terms thereof are deemed to be included in this Policy by reference. This Policy is effectively part of the terms of MADHU BANSAL(INH000010672) and is fundamental to your use of the MADHU BANSAL(INH000010672). The terms of MADHU BANSAL(INH000010672) including this Policy will prevail over anything contrary whatsoever.

Your privacy is important to us. We will use your personal information only in the manner set out in this Policy. We are committed to safeguarding the privacy of our website visitors, clients, prospects, and other third-parties. This Policy sets out how we deal with your personal information.

Our commitment towards protecting your personal information includes the following obligations:

We promise to protect your privacy and treat the information you give us as confidential.

The information you provide to us will be used by us only for the purpose for which it was sought.

We will never sell your personal data to anyone. Your decision to provide or not to provide any information will be respected without question.

We collect information, including personal data, about you to be able to make the MADHU BANSAL(INH000010672) and Services useful to you. This information may be collected by us from the data which you give to us while subscribing to or using our Services using the MADHU BANSAL(INH000010672) or any third-party sites. We may also derive your information from other sources. Such information may, inter alia, include the following:

Your personal identifiable information including your demographic details (such as your name, gender, marital status, age), contact details (such as your email address, postal addresses, telephone number)

Your financial information including banking details (such as your bank account no., bank, branch, IFSC), your fiscal details (such as your income, expenses, risk profile), and your monetary goals. This information is only collected on the website.

Your technical Information collected by our technology (such as your browser type, operating system, Internet Protocol (IP) address)

Information voluntarily provided by you or provided by third-parties while using our Services (such as engaging with third-parties over the MADHU BANSAL(INH000010672))

Information generated while you transact on MADHU BANSAL(INH000010672)(such as transacting in stocks or securities, using our Services)

Security-related information used by you while accessing the MADHU BANSAL(INH000010672) (such as usernames, passwords, email addresses) Information which you store on our servers (such as images, documents)

Information available in the public domain, including over social media s (such as your picture, friend list)

Information pertaining to any other person in respect of whom you make disclosures through the MADHU BANSAL(INH000010672) or while using our Services (such as a nominee). In such case, you must confirm and represent that each of the other investor(s) for whom an enquiry/ transaction has been made, has agreed to have the information shared by you, disclosed to us and further be shared by us with our business partners.

We may process the data that we have about you, in the following manner.

We may process data about your use of our Website and Services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of your visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your use of our Services. The source of the usage data is our analytics tracking system. In addition, we may use third-party analytics tracking services such as Google Analytics and Facebook Pixel. This usage data may be processed for the purposes of analysing the use of the Website and Services to improve our performance metrices, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely monitoring and improving our Website and Services.

We may process your data that is provided to us during the course of you taking assessments on our Website ("response data"). The response data may include your name, age, financial goals, and your responses to the questions that we may ask you. The source of the response data is you. The response data may be processed for the purposes of providing our services, ensuring the integrity of our operations and processes, maintaining back-ups of our databases, and for communicating with you. The legal basis for this processing is your consent.

We may process your information included in your personal profile on our Website ("profile data"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details, bank account details, broking account details, and demat account details. The profile data may be processed for the purposes of enabling and monitoring your use of our Website and Services, for providing

Services to you, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration and operation of our Website and Services.

We may process your personal data that are provided during the use of our Services ("service data"). The service data may include your name, address, telephone number, email address, bank account details, broking account details, and demat account details. The source of the service data is you. The service data may be processed for the purposes of providing our Services, ensuring the security of our Website and Services, maintaining back-ups of our databases, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our website and business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract.

We may process information that you post for publication on our website or through our Services ("publication data"). The publication data may be processed for the purposes of enabling such publication and administering our Website and Services. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our website and business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

We may process information contained in any enquiry you submit to us regarding our Services ("enquiry data"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you and for and for communicating with you. The legal basis for this processing is your consent.

We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your contact details, among others. The source of the customer relationship data is you or your affiliate. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications, promoting our products and services to customers, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our Website and business. In some cases, the legal

basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our Website ("transaction data"). The transaction data may include your contact details, your banking details, your credit card details, bank account details, broking account details, demat account details, and the details of the transactions carried out by you. The transaction data may be processed for the purpose of supplying the purchased goods and services, keeping proper records of those transactions, and for communicating with you. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our business. In some cases, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters, and for communicating with you. The legal basis for this processing is your consent.

We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is your consent. In some cases, the legal basis for this processing is our legitimate interests, namely the proper administration of our Website and business and communications with our business counterparts.

In addition to the specific purposes for which we may process your personal data set out in this Section, we may process any of your personal data identified in this Policy where necessary for:

the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks. Compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

We may use your data for the following purposes.

To authenticate you with the MADHU BANSAL(INH000010672)

To identify you as a registered user of the MADHU BANSAL(INH000010672)

To enable you to use the MADHU BANSAL(INH000010672) and our Services

To enable communications amongst you.

To facilitate the operations of the MADHU BANSAL(INH000010672), including the offer of services to you by SEBI-registered intermediaries such as research analysts; the interaction and communication between you, research analysts, the organisation of information relating to the aforementioned activities

To publish fact-based views and opinions regarding, inter alia, the Services offered on the MADHU BANSAL(INH000010672), based on the information available on the MADHU BANSAL(INH000010672)

To improve the quality of your experience when you interact with the MADHU BANSAL(INH000010672) and use our Services

To send you notifications, verification message(s) or email(s)

To allow our customer service to contact you, if necessary or respond to your queries and assist you with customer service or technical support

To send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes, customer analysis, market research and statistics

To request for reviews of our Services or any other improvements

To prevent and detect fraud or abuse of our Services as well as to prevent, detect and investigate any potential unlawful or prohibited activities.

By accepting this Privacy Policy, you hereby consent to the use of your personal data by MADHU BANSAL(INH000010672) for the purposes listed below. We may share your data with legal or statutory or regulatory agencies or authorities; our employees, officers, advisors and agents; our partners, transactional counterparties such as including stock brokers, investment advisors, research analysts, suppliers or service providers acting on our behalf (as the case may be), etc. solely for the purposes listed in this Policy.

We may share the information given by you with third parties where we feel that such third parties may improve the quality of services imparted by us to you.

We may collect financial information and disclose the same to third-parties as necessary to complete billing operations. We may require you to make payments for the services availed by using your credit card, wire transfer, debit card or cheque/cash. Verification of credit information, however, is accomplished solely by you through the authentication process. Your credit card/debit card details are transacted upon secure sites of approved payment gateways which are digitally under encryption, thereby providing the highest possible degree of care as per current technology. We provide you an option not to save your payment details. You are advised, however, that internet technology is not fully safe and you should exercise discretion while using the same.

In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We only share your personal data on a "need-to-know" basis with any third party. We shall take all reasonable steps to ensure that the confidentiality of your information is maintained by imposing strict confidentiality standards on all the third parties with whom we part this information. In all circumstances we shall ensure that your personal information is protected by strict confidentiality obligations. We shall not allow any third parties to retain your personal information longer than what is warranted by the nature of services rendered.

By agreeing to avail the service offered by MADHU BANSAL(INH000010672), you agreed to the collection, use and sharing of your personal data or Information by MADHU BANSAL(INH000010672) as per the terms of this Policy. You always have the right to refuse or withdraw your consent to share/dissemination of your

personal data by contacting us as per the details provided in this Policy. However, in such an event, you may no longer be eligible to avail our services.

We will not sell, share, rent or otherwise intentionally transfer your name, address, telephone number or e-mail address to market research companies, direct marketing companies or anyone else. The only exceptions when we may disclose your personal information to third parties are as follows:

You request us to share, or consent to us sharing, your data with the third parties for a specified purpose.

We provide your responses to a third party who is contractually bound to keep the information confidential and use it only for research or statistical purposes.

In the rare but possible circumstance that the information is subject to disclosure pursuant to judicial or other government subpoenas, warrants, orders or for similar legal or regulatory requirements.

Your data will be processed and stored in India.

Your personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. Subject to exceptions based on your continuing use of the MADHU BANSAL(INH000010672), we intend retain your personal data as follows:

Usage data will be retained for a minimum period of one week following the date of your visit, and for a maximum period of ten years following the date of your last visit.

Response data will be retained for a minimum period of one month following the submission of your response, and for a maximum period of ten years following the submission of your last response.

Profile data will be retained for a minimum period of one day following the date of deletion of your profile on our Website, and for a maximum period of ten years following such deletion.

Service data will be retained for a minimum period of one month following the fulfilment of the Service, and for a maximum period of ten years following the last date on which any obligation in respect of such Service concludes.

Publication data will be retained for a minimum period of one week following the publication of such data, and for a maximum period of ten years following the date on which such data is removed from such publication.

Enquiry data will be retained for a minimum period of one day following the date of the enquiry, and for a maximum period of ten years following the date of the enquiry.

Customer relationship data will be retained for a minimum period of one month following the conclusion of the said relationship, and for a maximum period of ten years following the conclusion of the said relationship.

Transaction data will be retained for a minimum period of one week following the date of the transaction, and for a maximum period of ten years following the date of the last transaction.

Notification data will be retained for a minimum period of one day following the date of unsubscribing from our newsletters, and for a maximum period of ten years following the date of request for such unsubscribing.

Correspondence data will be retained for a minimum period of one day following the date of the communication, and for a maximum period of twenty years following the date of the communication.

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- · Usage data : Parameters of usage being analysed
- · 2. Response data: Requirements of law 3.
- · Profile data: Nature of utilization of profile
- · 4. Service data: Nature of Service; requirements of law
- · 5. Publication data: Means of publication; citation of publication in other works
- · 6.Enquiry data: Means of enquiry; nature of Service enquired for
- · 7. Customer relationship data: Nature of relationship; requirements of law

- · 8. Transaction data: Nature of transaction; requirements of law
- · 9. Notification data: Terms of opt-in
- · 10.Correspondence data: Nature of correspondence; requirements of law

Notwithstanding the foregoing provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or where we reasonably believe that the retention of such data is required in order to protect your or any third-party interest.

This Section summarises the rights that you have in respect of your data. Please note that some of the rights available to you are subject to the requirements of the applicable law. You may peruse the relevant laws for a complete understanding your rights. Your principal rights concerning your personal data are as below:

Right to access: You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Subject to the condition that the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

Right to rectification: You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In certain circumstances you have the right to the erasure of your personal data without undue delay. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

Right to restrict processing: In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you do not desire erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data.

However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

Right to object to processing: In some circumstances, you have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims. You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Right to data portability: To the extent that the legal basis for our processing of your personal data is: (a) consent; or (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the legal or contractual rights of third-parties or where the law requires otherwise.

You may exercise any of your rights in relation to your personal data by a written notice to us. In order for us to comply with your request, your notice must clearly state the right that you wish to exercise and identify your information in respect of which you wish to exercise such right. Please note that as a security measure, we may require you to verify your identity before accepting any request concerning your personal data.

A cookie is a file containing a unique identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier

is then sent back to the server each time the browser requests a page from the server. Cookies do not typically contain any information that personally identifies you, but personal information that we store about you may be linked to the information stored in and obtained from cookies. You may change the options on your web browser and block cookies. However, blocking cookies may disable certain features on the MADHU BANSAL(INH000010672), and may hinder an otherwise seamless experience to use our Services. You can find more information about the types of cookies that we, and certain third parties use, why we use them, and how to manage them in our Cookie Policy.

We will make commercially reasonably efforts to secure the data provided to us and adopt reasonable security practices to ensure that the information collected is secured as per the standards required by applicable laws in India. Our information security policy may contain managerial, technical, operational and physical security control measures that may be commensurate with the information being protected herein. We are committed to continuously develop and implement administrative, technical and physical security measures to protect such information from unauthorized access or against loss, misuse or alteration. While we endeavour to take all reasonable and appropriate steps to keep secure the information collected and prevent unauthorized access, you acknowledge that the internet is not entirely secure and that we cannot and therefore do not provide any absolute assurance regarding the security of the information collected.

Our services may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

You may receive email updates from us through our newsletters, surveys, offers, and other promotional materials related to our Services. We hope you will find these updates interesting and informative. If you wish not to receive them, please click on the "unsubscribe" link or follow the instructions in each message. You may share your feedback and comments with us, including that relating to an issue or incidence. To report an incidence regarding your data, you may contact us using our contact details and inform us about such incidence.

We are not responsible for verifying the authenticity of the information supplied by you. In case of any erroneous data, our liability is limited to removal of such data from our system. We are not liable for any data loss or theft due to an unauthorized access to your computer or device. We shall not be responsible for any breach of

security or for any actions of any third parties that receives your personal data or events that are beyond our reasonable control including, acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of internet service or telephone service etc. Our liability is strictly limited in all cases to the extent set out in the Terms of Use document; please read the Terms of Use document before sharing your data with us.

We may generate derived data and anonymous statistical information based on the data available on the MADHU BANSAL(INH000010672). Such derived data and anonymous statistical information shall not identify you at a personal level and shall be exclusively our property. We may use such data or information for any legitimate purpose as we may determine, without any compensation to you.

In brief: We are MADHU BANSAL PROPRIETOR OF MADHU BANSAL'S. ("MADHU BANSAL PROPRIETOR OF MADHU BANSAL'S," "we" or "us"). We respect your privacy and work hard to protect the confidentiality of information that you give us. We will only share your personal data with third parties in the event that it's needed for the provision of services and data you have requested (explained in detail in this privacy policy).

MADHU BANSALis responsible for your personal data and is the sole owner of the MADHU BANSALwebsite ("Website"), MADHU BANSAL PROPRIETOR OF MADHU BANSAL'S, MADHU BANSALservices (each, a "Service") and all of the information collected on it. MADHU BANSALcollects information from users in several ways (explained in detail in this privacy policy).

This privacy policy applies to personal data that we collect from you when you visit this Website, create an account, use our applications or services ("you" or "your" being interpreted accordingly). It provides information on what personal data we collect, why we collect personal data, how it is used, the lawful basis on which your personal data is processed, how it is stored, and how we share information.

As used in this privacy policy, "personal data" means any information that relates to you from which you can be identified.

By using our Service or submitting your personal data, you are agreeing to accept the terms of this privacy policy, so please read it carefully. If you disagree with this privacy policy at any point or time, you should stop using our Services and delete your user account.

We may update this privacy policy at our discretion from time to time by posting a new version on our Website. You should check our Website occasionally to ensure any changes made are suitable for you. If required by applicable law, you will be informed of any significant changes made to the privacy policy.

The current version of this privacy policy was modified on Jan 19, 2025

There is no need to create an account when searching and viewing information from certain markets, such as symbols, quotes, financial data, as well as ideas and publicly available data of MADHU BANSALusers.

If you decide to create an account, you will need to provide us with some personal data so we can provide you with access to our additional services that users benefit from. You may also elect to provide us with additional information about you, as described below.

During registration you will be required to provide us with either:

- your username, email address;
- your account information with one of the following social Internet services: Facebook, Twitter, Google, Yahoo!, LinkedIn, Apple; and
- if you want to buy a subscription, we will need your first name, last name and postal address, PAN, AADHAR for kyc, mobile number.

In some cases, you may need to provide and verify your phone number. You can also add additional information about yourself in the profile settings, however, this is not mandatory.

The following information will not be publicly displayed:

• your first and last name, phone number and email and your kyc documents.

Our third party payment processor will also process information about your payment card and bank account information or payment account information that we require for the purpose of recording and processing your account registration.

#### Contact data

We also process any personal data you choose to give when corresponding with us by phone, email, or otherwise visiting and interacting with this Website or any other services we operate. By providing your phone number, you agree to receive text messages from us. Message and data rates may apply. Message frequency varies. We will not share your contact phone number with any other parties unless explicitly specified by this policy.

## Cookies and other technologies

We use browser cookies (small text files placed on your device) to administer our Site, gather and analyze statistical information, ensure security, to fight spam, and for advertising purposes. Cookies allow us to provide you with a better user experience when you browse our Website and also helps to improve its features. More detailed information on the use of cookies can be found in our cookies policy...

We also use web beacons (tiny graphics with a unique identifier) for analytics and advertising purposes and to develop, test, and improve our services further, as described in our cookies policy.

Like most websites, we use web server log files. Records in our log files include internet protocol (IP) addresses (see the "Device information" section below for further details), browser types, internet service providers, referring pages, exit pages, platform types, and date/time stamps. We use web server log files to administer the site, provide broad traffic information for site planning purposes, and to ensure that our terms of service agreement is being adhered to. Note that IP addresses are not tied to personal data in our web server log files.

#### **Device information**

We collect the following information about the devices you use to interact with our services: IP address of the device (from which we can also infer the country you are connecting from), device type, operating system, application and browser version. We collect this information to prevent spam and abuse of our services. IP addresses may be considered personal data in certain jurisdictions, and will be treated in accordance with this privacy policy.

# **Analytics**

When you are using our Website, we provide to another site, we may collect analytics information automatically. This information may include your general device information, device identifiers (for example, Google Advertising ID, if you are using an Android device, or Advertising Identifier (IDFA), if you are using an iOS device), network information, website, and application interaction events. We collect pseudonymous data only and this analytic information does not include any

personal identifiable information from your profile. We use this information to analyze and improve the work of our services and applications, and to develop, test, and improve our service further. For this purpose we may use internal analytic as well as third party service providers.

We use personal data in various ways that are necessary to provide the services you intend to use, certain legitimate interests, and as a necessity in order to comply with applicable law, as further described below.

We do not generally rely on your consent to allow us to process your personal data if there is another lawful ground available. If we do rely on your consent, we will make this clear to you at that time.

A profile is a set of information for each individual user that details his/her viewing preferences. User settings (chart settings, toolbars, buttons, etc.) are kept solely for the purpose of customizing the user's experience when using the Website, applications or user accounts. We do not share private profile settings with any third parties.

Note that when you create an account, other users or visitors may access your public profile and see any information you have made publicly available about yourself.

We use your contact details, such as username, email address, or phone number, in the following ways:

- to authenticate your user account, ensure its security along with the security of our services, and to prevent spam, fraud, and abuse;
- to acknowledge, confirm, and deal with your user account;
- to send all new users a welcome activation email to verify their email address;
- (For Paid Users) to provide you with subscription services and contact you regarding your use of such services. This is necessary for us to implement your requests; and
- Paid Users will also receive a notification email from our payment processor
  if there are any issues regarding billing their cards for auto-renew
  subscriptions. Users cannot opt out of these messages, though they can
  delete their account.

You may refuse to use our Website and may ask us to delete your account.. Your account will be deleted after 30 days. During this time, you can stop the deletion process at any time.

Please note that if you have requested your account to be deleted, we will delete the subsequent personal data you have supplied us. Some data, might be stored if asked by any authorities.

For legitimate business processes and for compliance with legal obligations, including tax laws, audits, and security, we must retain certain data for an extended period. This data includes, but is not limited to, transaction logs, financial records, addresses, and employment details. The duration of retention for each type of data will comply with specific legal requirements, extending up to 10 years.

Note that search engines, as well as third parties, can keep copies of your publicly available information once your account has been deleted. It should also be noted that published ideas will remain on the site and messages sent to other users cannot be deleted.

We may send you marketing emails about our products or services that are similar to the products or services you are subscribed to, including information about events and other promotions we feel may interest you. This is unless you have indicated to us that you do not wish to receive communications in this manner. We will send you other promotional information by email only with your consent, which was given at the time you provided us with your personal data. Users can opt out of receiving marketing communications at any time by clicking "unsubscribe" in one of the emails.

On rare occasions, it may be necessary to send out service-related announcements. For instance, if our service is interrupted for a prolonged period or a major functionality upgrade is released, we might send all users an email message.

When you open a support ticket, we use your contact details as well as information about your device, server logs, a description of the problem, along with any other supporting materials (videos, screenshots, etc.) to help resolve the issue(s).

We will process your personal data as necessary for certain legitimate business interests, which include the following:

- where we are asked to respond to any of your inquiries, comments, or grievances;
- to administer our services in order to better understand how visitors interact with the Website and application, and ensure that they are presented in the most effective manner for you and your computer/device;
- to develop and improve our mobile applications;

- to share personal data among our affiliated businesses for administrative purposes, provide subscription services, and in relation to our sales and marketing activities, except where we require your consent, as described above;
- to send you information about our products or services that are similar to the
  products or services you subscribed to (unless you have refused or opted out
  of receiving these emails at the time you provided us with your email address
  or you have indicated to us that you do not wish to receive communications
  in this manner). Our legitimate interest is to ensure our marketing is relevant
  to you, so we may process your data to send you information on our products
  or services that is specifically tailored to your interests;
- we may anonymize, pseudonymize, aggregate and de-identify the data that
  we collect and use this data for our own internal business purposes,
  including sharing it with our business partners, our affiliated businesses,
  agents and other third parties for commercial, statistical and market
  research purposes. For example, to allow those parties to analyse patterns
  among groups of people and conducting research on demographics,
  interests, and behavior;
- for internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, and as part of our efforts to keep our Website, network, and information systems secure; and
- to (a) comply with legal obligations, (b) respond to requests from competent authorities; (c) enforce our Terms of Use or House Rules; (d) protect our operations or those of any of our affiliated businesses; (e) protect our rights, safety or property, and/or that of our affiliated businesses, you or others; and (f) enforce or defend legal rights, or prevent damage. This means we can store and disclose your information to law enforcement authorities, state, or government agencies if we establish that such disclosure is necessary to comply with the law. This includes responses to court orders or subpoenas, as well as other judicial or regulatory processes.

As used in this privacy policy, "legitimate interests" means the interests of MADHU BANSALand our affiliated businesses in conducting and managing our business. When we process your personal data for our legitimate interests, we make sure to consider and balance any potential impact on you and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We do not use personal data for activities where our interests override the impact they may have on our users, unless we have their explicit consent or those activities are otherwise required or permitted by law. You have the right to object to the processing of your personal data that is based on our legitimate interests at any time, on grounds relating to your particular situation.

We share your personal data with third parties in the following situations:

- Service providers: MADHU BANSAL PROPRIETOR OF MADHU BANSAL'S, like many businesses, occasionally engages with selected third parties who act on our behalf to support our operations, such as (i) card processing or payment services (see the point below headed "Payment information"), (ii) IT suppliers and contractors (i.e. data hosting providers or delivery partners) as necessary to provide IT support and enable us to provide subscription services and other goods/services available on this Website or to users, (iii) web and mobile analytics providers, (iv) providers of digital advertising services, and (v) providers of marketing and sales software solutions. Pursuant to our instructions, these parties may access, process or store your personal data in the course of performing their duties to us and solely in order to perform the services we have hired them to provide.
- Payment information: Paid Users must provide payment information (name, postal address, payment card information or payment account information). This information is used for billing purposes only and is processed by our payment processors. When you are making a payment, we do not have access to your payment card information. Should we have any issues with processing an order, the email address you have provided will be used to contact you. For more information on what type of information is collected by our payment processors, please view their privacy policies:
  - Razorpay Privacy Policy
  - Apple Privacy Policy
  - Google Privacy Policy
- Analytics providers: We may use third-party service providers to monitor and analyze the use of our services and mobile/desktop applications. We use this information to analyze and improve the work of our services and mobile applications.
- We may use Google Analytics as a web analytics service on the Website, mobile apps and in conjunction with the widgets we provide. For more information on Google Analytics privacy practices, you can check here.
- **Business transfers:** If we sell our business or our company assets are acquired by a third party, personal data held by us about our general account users, subscription account users or customers may be one of the transferred assets.
- Administrative and legal reasons: If we need to disclose your personal data (i) to comply with a legal obligation and/or judicial or regulatory proceedings, a court order or other legal process, (ii) to enforce our Terms of Use, House Rules or other applicable contract terms that you are subject to, or (iii) to protect us or our contractors against loss or damage. This may include, but is

- not limited to, exchanging information with the police, courts or law enforcement organisations.
- Advertising: We display advertising on the Website and may use remarketing
  and tracking features. Remarketing features allow us to display advertising
  in a more targeted manner in order to present advertisements of interest to
  users, based on their activity on other websites. Tracking features allow us
  to collect information about impressions, ad clicks and certain actions that
  users complete through our Website. This data also helps us evaluate the
  performance of ad campaigns. Note that we collect pseudonymous data
  only. We may use the following services for advertising, remarketing, and
  tracking purposes:
  - Google Ad Manager and Google Ads they help us serve and measure the success of ads on our site.

For more information about how Google uses data, please refer to their Privacy & Terms document as well as Google's Privacy Policy. You can opt out of this by visiting the Network Advertising Initiative opt-out page or by turning off the personalization of Google ads via their Ad Settings page.

 Meta pixel — allows us to measure, optimise, and build audiences for our advertising campaigns.

You can learn more about Meta's data policy here. You can manage your personal settings for advertisements on Facebook at Your Ad Preferences. In case you don't have a Facebook account, you can use Your Online Choices website or DAA's WebChoices Tool to manage your ad experience.

• Note that we do not share any personal information with our advertisers. They can only access general statistics that include the amount of impressions their ads have generated as well as clicks.

We use technical and organizational safeguards to protect your personal data and require third parties with whom we work to do the same.

We use Transport Layer Security (TLS) encryption technology in order to protect certain information that you submit to us. This technology protects you from having your information intercepted by anyone while it is being transmitted to MADHU BANSALor payment processor. While on a secure page, such as our order form, the "lock" icon in the browser window is displayed, confirming that a secure and encrypted connection has been established with the Website. We work hard to ensure that our Service is secure and that we meet industry standards. We also use

other safeguards, such as firewalls, authentication systems (i.e. passwords, and personal identification numbers), and access control mechanisms to control unauthorized access to systems and data. If you have chosen to create an account, you are responsible for doing everything you reasonably can to keep your access details secret. You must not share these details with anyone else.

We also do our best to protect user information offline. All of our users' personal information is restricted to our offices. Only employees who need to see the information to perform their jobs are allowed to access it.

The servers that store personal data are located in a secure environment in a locked facility.

We are constantly improving the ways we secure, store, and process the data we collect, including the addition of physical security measures that help us counter unauthorized access to our systems. However, no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee its absolute security.

This Website is not directed towards children who are under the age of 18. We do not knowingly contact or collect personal information from children below the age of 18 years, or sensitive personal data ("racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or a natural person's sex life or sexual orientation," etc.). If you believe we have inadvertently collected such information, please contact us immediately so that we can either obtain special consent or delete the information.

At our discretion we may add links (web links) to other websites from our Website. These websites can be run by third parties with separate and independent privacy policies. We, therefore, have no responsibility nor are we liable for any content, activities or privacy policies of these linked sites. We suggest you read the privacy policy of each and every site that you visit.

If prompted, we will confirm whether or not we are processing your personal data and if so, we will provide you with a copy of that personal data along with any other pertinent details. If you require additional copies, we may need to charge a reasonable fee, but this can be discussed and depends on the situation.

You may ask us to restrict or 'block' the processing of your personal data in certain circumstances, for example, if you contest the accuracy of the data or object to us

processing it. We will notify you before we lift any restriction on processing. If we share your personal data with others, we will notify them of the restriction wherever possible. If prompted, and if it is possible and lawful to do so, we will also notify you with whom we have shared or will share your personal data so you can contact them directly.

# You may:

- ask us to stop processing your personal data at any time, and we will do so. If
  we are relying on a legitimate interest to process your personal data, then it
  should not be a problem unless we demonstrate compelling legitimate
  grounds for processing;
- object to our processing of your data for the purposes of direct marketing at any time. This can be done by clicking the "unsubscribe" button in our marketing emails.

If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness with which we process your data before receiving notice of your wish to withdraw your consent. We emphasize that we do not generally rely on your consent to allow us to process your personal data if there is another lawful ground available. If we do rely on your consent, we will make this clear to you at that time.

If we share your personal data with others, we will notify them of any corrections made whenever possible. If prompted, and where possible and lawful to do so, we will also notify you with whom we have shared your personal data so you can contact them directly if need be.

You have the right to refuse to use our Services and may ask us to delete or remove your personal data in certain circumstances. If we share your data with others, we will notify them of the edits wherever possible. If prompted, and wherever possible and lawful to do so, we will also notify you with whom we have shared your personal data so you can contact them directly if need be.

We will keep your personal data (1) until you decide to delete your account (upon request), or (2) as required by law or as necessary for legitimate business purposes (i.e. for tax, legal, accounting, fraud, or abuse prevention, and/or other purposes). This data can be stored even after an account is deleted.

Upon expiration of the applicable retention period, we will securely destroy your personal data in accordance with applicable laws and regulations. In some

circumstances we may anonymize your personal data so that it can no longer be associated with you. In this case, such data is no longer considered personal.

If you consent to receive marketing communications, we will keep your data until you unsubscribe, which is possible via the 'unsubscribe' button at the end of our marketing emails. Additional methods to unsubscribe may be added in the future.

You have the right to obtain your personal data from us, which that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will give you your personal data in a structured, commonly used, and machine-readable format. You may reuse it elsewhere if you so wish.

If you have concerns about our privacy practices, including the way we handle or have your personal data, you can report it to any competent data protection authority. Note that we may need to ask you for further information to verify your identity before we can respond to any request.

### YOUR DATA WILL BE PROCESSED AND STORED IN INDIA

This Cookies Policy ("Cookies Policy") describes cookies and other technologies that MADHU BANSAL PROPRIETOR OF MADHU BANSAL'S. ("MADHU BANSAL PROPRIETOR OF MADHU BANSAL'S", "we", "us" or "our") uses on its website ("Site") and the choices that users have. This Cookies Policy is a part of MADHU BANSAL Privacy Policy.

When you first visit the Site, you will be asked to consent to the use of cookies in accordance with this Cookies Policy. Note that if you accept, we will store them on your computer.

### What is a cookie?

A 'cookie' is a piece of information that is sent to your browser by a website you visit. The Site uses first party cookies (those set by a website that is being visited by the user at the time. For example, cookies via www.thefinbergadvisory.com) as well as third-party cookies (set by a different domain), as described below.

Cookies can be stored on your computer for various periods of time. They can be in a form of either "session cookies" or "persistent cookies." A session cookie only lasts as long as the browser session and is automatically deleted when you close your browser. A persistent cookie lasts long after your browser is closed and will remain until it expires (as determined by the third party in charge of placing it) or

until you delete the cookie. Persistent cookies are used to help sites recognize and identify your computer when you open your browser and surf the Internet again.

The data collected through cookies may include information about the IP (Internet Protocol) address of your device, browser type, language, operating system, the state or country from which you have accessed the Site, the date and the time of your visit(s), the number of links you click on this Site, the functions you use, the searches you request, and the data you have saved while on this Site. **MADHU BANSAL**may use the information collected for a variety of necessary, legitimate purposes, including user authentication, user interface customization, security, research and analysis to improve the functionality of our Site, and advertising (for more information on how we use your data, please read our Privacy Policy).

You can find out more about cookies (including how to see or manage them) at All About Cookies or About Cookies.org websites.

### How do we use cookies?

The following sets out how we use different categories of cookies, as well as information on your options for managing your settings for the data collected by these technologies:

- Necessary cookies: These cookies are used to provide users with services available through a Site and to use some of its features, such as the ability to log-in and access secure areas, provide pop-up notices, and accept language from sign-up forms. These cookies are essential for using and navigating a Site. Without them, basic functions of our Site would not work. Because these cookies are strictly necessary to deliver our Site's essential services, you cannot refuse them.
- **Performance/Analytics cookies:** These cookies are used to recognize and count the number of Site visitors, gather statistics regarding how visitors move around the Site (including number of page views and the amount time spent on each page) and for conversion tracking and click hotspots. This helps us improve the way our Site works and general user experience. For example, these cookies allow us to ensure that users are able to find what they need easily.
- Advertising cookies (ad cookies): These cookies are used to show advertising that is relevant to you.
- Cookies used to integrate third party services: These cookies are used to integrate third-party functions on the Site, such as videos, maps, or social network plug-ins.

- Other third party cookies: On some parts of the Site, including, but not limited, to news widgets, we use content provided by other websites(third parties). These third party sites are able to set their own cookies in some cases. Note that we have no control over these third-party cookies. You can turn them off by disabling them on your browser. You can find more information on the most popular web-browser help pages:
  - Google Chrome
  - Mozilla Firefox
  - Microsoft Edge
  - Safari (macOS)
  - Safari (iOS)

We may change the type of third party service providers that place cookies on our Site and amend this Cookies Policy at any time by posting the amended version on our Site. Unless additional notice or consent is required by applicable laws, this will serve as your official notification of these changes.

If you have any questions or suggestions regarding personal data processing, please contact us.

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will update the "Last updated" date at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

### 17. CONTACT DETAILS

This Website is owned and operated by MADHU BANSAL(INH000010672) (INH000010672)

Registered office address is: 409 NAURANG HOUSE KG MARG DELHI-110092

Communication Address is: 409 NAURANG HOUSE KG MARG DELHI-110092

Principle place of Business: 409 NAURANG HOUSE KG MARG DELHI-110092

You can contact us (a) by post: at our registered office address provided above; (b) by email: on madhubansal0987@gmail.com; (c) by telephone: on +9899561222

For any request that is not attended to your satisfaction, you may reach out to Mr. Madhu Bansal, Compliance Officer, on madhubansal0987@gmail.comor on +919899561222

We appreciate you taking the time to read this policy. We know that you are placing your trust in us when you choose to share your personal information with us and we intend to use it responsibly.

Collection of Sensitive Personal Data Or Information:

Madhu Bansal's may for the purpose of rendering its services, collect personal information such as:

- Name, gender, residential / correspondence address, telephone number, date of birth, marital status, email address or other contact information;
- PAN, KYC Status, Signature and Photograph;

The information shared with us by you, represents your identity with us. Please update us through email or call, as and when, any changes take place regarding any of the details that you've shared with us.

By subscribing to our services, you consent to our Privacy Policy and Terms of Use.