

## Privacy Notice EU users

This Privacy Notice outlines HDFC Securities Limited approach to data protection to fulfil its obligations under the EU General Data Protection Regulation 2016/679 ("GDPR"). This Privacy Notice applies to personal data of the Covered Person(s) which is processed by or for HDFC Securities as a controller, whether in physical or electronic mode. In this Privacy Notice, the expressions 'personal data', 'data subject', 'controller', 'processor' and 'processing' shall have the meanings given to them in the GDPR.

HDFC Securities is committed to treating data privacy seriously. It is important that you know exactly what we do with the personal data you and others provide to us, why we process it and what it means to you. Please read this Privacy Notice carefully to understand our views and practices regarding your personal data and how we will treat it.

### **Data Privacy Matters**

This Privacy Notice applies in relation to all our products and services as applicable to the Covered Persons. Our product or service terms and conditions will specify which of our businesses is providing the relevant product or service to you. If you are a customer of one of these businesses, please also read the Data Privacy Notice applicable to such respective businesses. If you have any questions about how your personal data is processed, please contact us.

### **Who we are**

Throughout this document, "we", "us", "our" and "ours" refer to HDFC Securities Limited

HDFC Securities means:

HDFC Securities Limited, I Think Techno Campus Building-B Alpha",Office Floor 8 ,Opp. Crompton Greaves Near, Kanjurmarg Station Rd, Kanjurmarg East, Mumbai, Maharashtra 400042

Website : <https://www.hdfcsec.com/>

Our contact details are given at the end of this Privacy Notice. Should you need further details about HDFC securities limited, please visit the about us page in our website.

### **Who is covered under this Notice (Covered Persons)?**

Any natural person in relation to whose personal data (to the extent processed by or for HDFC Securities), the GDPR applies, shall be to the extent of such personal data and such processing be the "Covered Person(s)" or "You".

## **The information we collect about you**

The information we collect falls into various categories as under:

- **Identity & contact information**

- Name, address, office address, signatures, biometric data, date of birth, nationality, citizenship, country of birth, copies of identity cards ("ID"), contact details, email id, marital status, relatives' information, nomination, medical condition, PAN details /TIN/GST-IN/Aadhaar details /Social Security Number/Passport or its equivalent, Visa, Photograph, Gender, Tax reference number, permanent residency details and residency permits, PIO/ OCI Card, CDC Card, Voters ID. Driving License, utility bill, Ration Card, Flat Maintenance Bill, Insurance Copy, Gas Bill, Registered Lease or Sale Agreement of Residence, Foreign Account Tax Compliance Act (FATCA) details.
- Proof of identity/ address issued by any authority including the following: Elected Representatives to the Legislative Assembly / Parliament / Document issued by any Govt. or statutory authority; Central/state governments & its departments; Statutory/regulatory authorities; Public Sector Undertakings (PSU's); Scheduled Commercial Banks; Public financial institutions; Colleges affiliated to universities (this can be treated as valid only till the time the applicant is a student); Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc. to their members; Proof of address issued by Gazetted Officer / Notary Public.

- **Financial details/circumstances**

- Trading account details, Trading account number, DP details
- Bank account details, investments history, credit/debit card details including with photographs on the card, income details, net worth, history in relation to these.
- Employment / occupational information.
- Residential status under banking, general and tax laws.
- Spending/saving/investing/payments/receipts/borrowing history.
- Risk profile, financial objectives, financial knowledge and experience, preferences and any other information to assess the suitability of our products to you.
- Bank statement/ passbook
- Original cancelled cheque
- Letter from foreign bank
- Letter from existing bank

- **Information you provide us about others or others provide us about you**

- If you give us information including personal data about someone else (for example, information about a spouse or financial associate provided during the course of a joint application with that person or information about a parent or guardian or employer or details of other holders in case of a joint account) or someone gives us information about you including as above, we may add it to any personal data we already hold and we will use it in the ways described in this Data Privacy Notice.
- Your personal data from third party providers: In order to enhance our ability to provide relevant marketing, offers, and services to you, we obtain personal data about you from other sources with your consent, such as email service providers, public databases, joint marketing partners, social media platforms, as well as from other third parties as appropriate.
- Information including personal data from credit information companies/ bureaus, credit reference agencies, risk management and fraud prevention agencies, national and government databases.

- **Personal data which you have consented to us using**

- Your agreement to allow us to contact you through certain channels to offer you relevant products and services.

- **Information from online activities.**

- We collect information about your internet activity using web technology known as cookies, which can often be controlled through internet browsers. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Policy.
- Your digital and electronic devices where we perform various checks designed to ascertain and verify your residency to ensure we meet our regulatory obligations. These checks include identifying the IP address your device connects from and the collection of information about your use of the website or mobile app (including device type, operating system, screen resolution, and the way you interact with us).

- **Other personal information**

- Information in relation to data access, correction, restriction, deletion, porting requests and complaints.
- CCTV images and data at HDFC Securities branches & offices (but only for security reasons and to help prevent fraud or crime).
- Conversations during meetings/calls/correspondences/discussions with HDFC Securities staff including IVR recording.

### **When and how we collect personal data about you?**

#### **Personal data about you is gathered or collected:**

- When you ask us to provide you with certain products and services.
- When you use our services or products.
- During the course of transactions.
- When you apply for products, make enquiries or engage with us or with any other person where we are involved for any other person in the transaction concerning you
- When you use our website and online services provided by us (including mobile applications) and visit our branches, offices.
- When you email or call or respond to our emails/phone calls or during meetings with HDFC Securities staff or its service providers or representatives.
- When you or others give us personal data verbally or in writing. This personal data may be on application forms, in records of your transactions with us or if you make a complaint.
- From information publicly available about you. When you make information including personal data about yourself publicly available on your social media accounts or where you choose to make information available to us through your social media account, and where it is appropriate for us to use it

### **How we process your Personal Data?**

Whether we're using it to confirm your identity, to help in the processing of an application for a product or service or to improve your experiences with us, your personal data is always handled with care and the principles outlined in this Data Privacy Notice are always applied.

### **Lawfulness and Purposes of the processing**

The lawfulness and legal basis for obtaining, processing personal data about you will be one or more of the following:

- Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. To allow us to take

actions that are necessary in order to provide you with the product / service (performance of a contract), for example, to make and receive payments

- Processing is necessary because of a legal obligation that applies to us. It may be necessary to allow us to comply with our legal obligations, for example, obtaining proof of identity to enable us to meet our anti-money laundering obligations under applicable law.
- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party. Processing may be required to meet our legitimate interests, for example, to understand how customers use our services and to develop new services, as well as improve the service we currently provide.
- Where we have your consent to do so.
- Its processing is necessary to protect your “vital interests” where we need to process your personal data and you are not capable of providing consent (emergency situations).

The table below sets out the purposes for which we use your personal data and our legal basis for doing so. Where we are relying on a legitimate interest, these are also set out below

What we use your personal data for	The legal basis for doing so (one of more under each sub-heading)
To provide our products and services to you and perform our contract with you	Where necessary for the performance of our agreement or to take steps to enter into an agreement with you
Establish your eligibility for our products and services.	Where the law requires this
Manage and administer your accounts, policies, benefits or other products and services	Where it is in our legitimate interests to ensure that our customer accounts are well-managed, so that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers
Process payments that are paid to you or by you. For example, when you trade shares we would share transaction details with exchange (e.g. BSE, NSE).	Where it is in our legitimate interests to ensure that complaints are investigated, for example, so that our customers receive a high standard of service and so that we can prevent complaints from occurring in future
Contact you by post, phone, text message, email, social media, fax, using our website or other means, but not in a way contrary to your instructions to us or contrary to law.	In case of sensitive information, such as medical information, where you have agreed
Monitor and record our conversations when we speak on the telephone (for example, to check your instructions to us, to analyze, to assess and improve customer service and for training and quality purposes).	

<p>Manage and respond to a complaint or appeal.</p> <p>To undertake checks including authentication/verification of your data for the purposes of security, detecting and preventing fraud and to verify your identity before we provide services to you. These checks may reveal political opinions or information about criminal convictions or offences.</p>	
<p>To manage our business for our legitimate interests</p> <p>Provide service information, to improve our service quality and for training purposes</p> <p>Conduct marketing activities, for example, running competitions, promotions and direct marketing (provided that you have not objected to us using your details in this way), and research, including customer surveys, analytics and related activities</p> <p>To cross sell products and services of our affiliates.</p>	<p>Where necessary for the performance of our agreement or to take steps to enter into an agreement with you</p> <p>Where the law requires this</p> <p>Where it is in our legitimate interests to develop and improve our products and services to ensure we can continue to provide products and services that our customers want to use and to ensure our business model remains competitive.</p> <p>Where it's in our legitimate interests to provide you with information about our products and services that may be of interest.</p> <p>Where we have your consent to do so.</p>
<p>To run our business on a day to day basis</p> <p>Carry out strategic planning and business portfolio management.</p> <p>Protect our business, reputation, resources and equipment, manage network and information security (for example, developing, testing and auditing our websites and other systems, dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services) and prevent and detect fraud, dishonesty and other crimes (for example, to prevent someone trying to steal your identity),</p> <p>Manage and administer our HDFC Securities legal and compliance affairs, including complying with our obligations to Regulatory bodies, or other service providers, compliance</p>	<p>Where necessary for the performance of our agreement or to take steps to enter into an agreement with you</p> <p>Where the law requires this</p>

<p>with regulatory guidance and voluntary codes of practice to which we have committed and to comply with directive/order of any law enforcement agencies</p>	
<p>To share your information with Indian or other relevant tax authorities, Securities Exchange Board of India, National Stock Exchange, Bombay Stock Exchange and other government authorities(including central and local government), regulatory and statutory bodies, credit reference agencies, fraud prevention agencies, and India and overseas regulators and authorities</p> <p>To perform certain credit checks so that we can make responsible business decisions.</p> <p>To assist with the prevention and detection of fraud and other crime</p>	<p>Where the law requires this</p> <p>Where we have a legitimate interest in performing certain credit checks so that we can make responsible business decisions. As a responsible organization, we need to ensure that we only provide certain products to companies and individuals where the products are appropriate, and that we continue to manage the services we provide, for example if we consider that you may have difficulties making a payment to us.</p> <p>Where we have a legitimate interest in assisting with the prevention and detection of fraud and other crime</p> <p>More detail on our data sharing with these organizations is set out below</p>
<p>To send electronic messages to you about product and service offers from HDFC Securities</p> <p>To use transaction history/account information from your HDFC Securities account to identify your trading behavior/trend in order to personalize offers that are exclusive and individual to you, based on your account transactions.</p> <p>To use cookies in accordance with our Cookie Policy.</p> <p>To use information you have made public and combine with this with the activities outlined above. When we ask for your consent, we will provide you with more information on how we will use your data in reliance on that consent, including in relation to third parties we would like your consent to share your data with</p>	<p>Where necessary for the performance of our agreement or to take steps to enter into an agreement with you</p> <p>Where the law requires this</p> <p>Where we have your consent to do so.</p>
<p>To disclose information to law enforcement authorities and entities or persons, to whom or</p>	<p>Where necessary for the performance of our agreement or to take steps to enter into an</p>

before whom it is mandatory to disclose the personal data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals.	agreement with you Where the law requires this
To transfer data for assignments, transfers, etc.	Where necessary for the performance of our agreement or to take steps to enter into an agreement with you. Where the law requires this. Where we have your consent to do so.
For product analysis and developing market and product and business strategy	Where we have a legitimate interest to do this. Where we have your consent to do so.
For storing information	Where necessary for the performance of our agreement or to take steps to enter into an agreement with you. Where the law requires this. Where we have your consent to do so. Where we have a legitimate interest to do this.
To share information with service providers, vendors	Where necessary for the performance of our agreement or to take steps to enter into an agreement with you. Where we have your consent to do so. Where we have a legitimate interest to do this.

When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and before collecting, we ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

We will send you messages by post, telephone, text, email and other digital methods like mobile applications, push notifications, or online Trading services (and new methods that may become available in the future). These messages may be:

- To help you manage your account(s)

- Messages we are required to send to comply with our regulatory obligations, such as changes to your agreements, and to give you information you need to manage your money
- To keep you informed about the features and benefits of the products and services you hold with us
- To tell you about products and services (including those of others) that may be of interest to you – these are marketing messages sent in accordance with your preferences. You can ask us to stop or start sending you marketing messages at any time by writing to us.

### **Automated processing**

The way we analyze personal information in relation to our products and services including applications, credit decisions, determining your eligibility for the products or services, may involve automated profiling and decision making, this means that we may process your personal data using software that is able to evaluate your personal aspects and predict risks or outcomes as also where the decision making may be automated.

We may also carry out automated anti-money laundering and sanctions checks. This means that we may automatically decide that you pose a fraud or money laundering risk if the processing reveals your behavior to be consistent with money laundering or known fraudulent conduct, is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk:

- We may refuse to provide the services you have requested or we may stop providing existing services to you
- A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services or employment to you.

You expressly acknowledge that the automated decision is necessary for entering into or performance of contract and/or you explicitly consent to such automated decision making, hence you subject to even the decisions which are solely based on automated processing. You have rights in relation to automated decision making: if you want to know more please contact us using the details set out in the Contact Us section.

### **Cookies**

We may use cookies and similar technologies on our websites, mobile apps, and in our emails. Cookies are text files that get small amounts of information, which your computer or mobile device stores when you visit a website or use a mobile app. When

you return to the websites or mobile apps – or visit websites and mobile apps that use the same cookies – they recognize these cookies and therefore your device. We use cookies to do many different jobs, like letting you navigate between pages efficiently, remembering your preferences and generally improving your online experience. They can also help ensure that the advertisements and marketing material (“ads”) you see online are more relevant to you and your interests. We also use similar technologies such as pixel tags and JavaScript to undertake these tasks. We also use cookies in some of our emails to help us to understand a little about how you interact with our emails, and to help us improve our future email communications. These cookies also help ensure that the ads you see online are more relevant to you and your interests.

**Our respective websites and mobile app terms and conditions give you more information on these technologies, how and where we use them and how you can control them.**

### **How to manage and disable cookies?**

For instructions on blocking and deleting cookies, see the privacy settings and help documentation of your specific browser’s website. If you use more devices and/or browsers, you will need to disable cookies on each device and on each browser separately. Here are the locations of the cookie settings for all major web browsers:

- Internet Explorer – Tools > Internet Options > Privacy tab.
- Mozilla Firefox – Tools > Options > Privacy menu.
- Safari users – Edit > Preferences > Privacy menu.
- Chrome users – Settings > Content Settings > Privacy > Cookies.

If you limit the ability of our websites to set cookies, this may prevent you from using certain features of our website properly and your user experience – which will no longer be personalized for you – may deteriorate. You may also be able to opt out from certain cookies through third party cookie management sites. Disabling cookies may prevent you from using certain parts of our website. If you delete your cookies from the browser, you may need to remember to re-install opt-out cookies. In the past we would have dropped the cookies in your device when you accessed our online platforms. For removing these cookies, you will need to go to your respective browser settings in your devices and remove them.

### **Recipients: Who we share your personal data with:**

We only share your personal data with the following persons and/or in the following circumstances, and only as may be necessary:

- Your authorized representatives
- Third parties we need to share your personal data with in order to facilitate trades made by you (which includes BSE & NSE)

- We may also share your personal data with the following third parties to help us manage our business for our legitimate interests:
  - Statutory and regulatory bodies and authorities (including central and local government e.g. SEBI) and law enforcement authorities, investigating agencies and entities or persons, to whom or before whom it is mandatory to disclose the personal data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals.
  - Overseas regulators and authorities in connection with their duties (such as crime prevention).
  - Third parties bank may engage to provide services to you.
  - Processors and service providers of HDFC Securities engaged for its various activities and services. Identity and address verification organizations who may record and use your information and disclose it to other lenders, financial services organizations and insurers. Your information may be used by those third parties to make assessments in relation to your creditworthiness for debt tracing
  - Other banks and financial institutions, quasi-governmental institutions like clearing houses, network associations etc. where required in terms of contract or legal requirements
  - Courier or postal service providers for the purpose of sending or collecting of mails to you as a customer
  - Any other person or organization after a restructure, sale or acquisition, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both)
  - HDFC Securities branches in India, Affiliates and group entities.
  - Transferees and assignees and potential transferees and assignees
  - Email service providers and telecommunication companies

For further information, please refer to our product specific terms and conditions and application form.

### **Period of storage of your personal data**

We will keep the personal data we collect about you on our systems or with third parties for as long as required for the purposes set out above or even beyond the expiry of transactional or account based relationship with you: (a) as required to comply with any legal and regulatory obligations to which we are subject or (b) for establishment, exercise or defense of legal claims.

### **Implications of not providing personal data or Withdrawing Consent**

Sharing personal data with us is in both your interest and ours.

We need your personal data in order to:

- Provide our products and services to you and fulfil our contract with you.
- Manage our business for our legitimate interests.
- Comply with our legal obligations.

When we request personal data, we will inform you if providing it is a contractual requirement, a statutory requirement or not, and whether or not we need it to comply with our legal obligations.

You may choose not to share personal data or withdraw consent, but doing so may limit the services we are able to provide to you (unless consent is not the only legal basis for processing and there are other legal basis as well), particularly as under.

- We may not be able to provide you with certain products and services that you request. We may not be able to continue to provide you with or renew existing products and services if such collection or updating of personal data is a legal or regulatory requirement to which we are subject.
- We may not be able to assess your suitability for a product or service, or, where relevant, give you a recommendation to provide you with a HDFC Securities product or service.

However, if you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal or the other legal basis which we may have for such processing.

### **Processing your personal data outside the EEA**

HDFC Securities Limited is incorporated and regulated in India & is governed under applicable laws. As such, your personal data is stored on secure systems within HDFC Securities premises within India and with providers of secure information storage in India. Further, we may transfer or allow the transfer of personal data about you and your products and services with us to our service providers and other organizations outside the European Economic Area (EEA), with adequate safeguards to ensure your personal data remains adequately protected. If you need copy of safeguards provided to transferred personal data, please notify us in accordance with the “How to contact us?” section below. These jurisdictions and countries outside EEA may have different and less stringent laws relating to the degree of confidentiality afforded to the personal data and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

## **Links to Other Websites**

From time to time, our website may contain links to and from websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites may have their own privacy notices and that we do not accept any responsibility or liability for any such notices. Please check these notices, where available, before you submit any personal data to these websites

## **Children**

If you are a parent of a child under 16 (or such age as applicable for GDPR purposes in the respective EU Member States), you hereby give your consent or authorize the consent if you wish your child to access HDFC Securities Services

## **In How to contact us**

If you have any questions about how your personal data is gathered, stored, shared or used, or if you wish to exercise any of your information rights, please contact our  
Contact at (Email): **services@hdfcsec.com**  
Phone Number: 39019400 (Prefix your local code)

## **Changes to this notice**

We will update this Data Privacy Notice from time to time. Any changes or updates will be made available on this page/ our website. .  
Dated: 16 Nov 2018