

Pravia Investment Advisors Private Limited, (hereinafter referred to as "the Adviser", "we", or "us") is a SEBI-registered Investment Adviser committed to protecting the privacy and confidentiality of our clients' ("you" or "Client") personal and financial information. This policy outlines how we collect, process, store, and share your data in compliance with the **SEBI (Investment Advisers) Regulations, 2013**, and the **Digital Personal Data Protection Act, 2023**.

1. Collection of Information

We collect personal data necessary to provide investment advice and fulfill regulatory "Know Your Client" (KYC) norms. This includes:

- **Identity Data:** Name, PAN, Aadhaar, Passport details, photograph, and signature.
- **Contact Data:** Residential address, email address, and mobile number.
- **Financial Data:** Income details, bank account statements, demat account details, existing investment portfolio, tax returns, and credit liabilities.
- **Risk Profile Data:** Information regarding your investment experience, risk tolerance, and financial goals as required under Regulation 16 of SEBI (IA) Regulations.

2. Purpose of Processing

We process your data solely for the following "Lawful Purposes":

- 1) **Service Delivery:** To formulate personalized investment advice, financial plans, and portfolio strategies.
- 2) **Regulatory Compliance:** To comply with SEBI KYC norms, Anti-Money Laundering (AML) standards, and suitability assessment requirements.
- 3) **Communication:** To send trade alerts, investment reports, invoices, and renewal notices.

3. Consent Mechanism

By engaging our services and signing the Investment Advisory Agreement, you provide **explicit consent** for us to process your personal data. You have the right to withdraw this consent in writing; however, such withdrawal may result in our inability to continue providing advisory services to you.

4. Data Disclosure & Sharing

We do **not** sell your data to third parties. We may share your information only in the following circumstances:

- **Regulatory Authorities:** With SEBI, Stock Exchanges, or other law enforcement agencies if required by law or during inspections/audits.
- **Service Partners:** With strictly vetted third-party vendors (e.g., KYC Registration Agencies (KRAs), CRM software providers, auditors) who are contractually bound to protect your data.

- **Legal Requirement:** To comply with court orders or legal proceedings.

5. Data Security (Cyber Security)

In compliance with the **SEBI framework on Cyber Security and Cyber Resilience**, we implement robust technical and organizational measures to protect your data, including:

- Encryption of sensitive data at rest and in transit.
- Access controls restricting data availability to authorized personnel only.
- Regular cyber security audits and vulnerability assessments.

6. Retention of Records

In accordance with **Regulation 19(3)** of the SEBI (Investment Advisers) Regulations, 2013, we shall retain all client records (including KYC, risk profiles, and advice logs) for a minimum period of **five (5) years**.

- After the mandatory retention period expires, data may be securely deleted or anonymized unless required for ongoing legal disputes.

7. Rights of the Client (Data Principal)

Under the data protection framework, you have the right to:

- **Access:** Request a summary of the personal data we hold about you.
- **Correction:** Request updates or corrections to inaccurate or incomplete data.
- **Grievance Redressal:** Lodge a complaint regarding the processing of your data.

8. Grievance Redressal Mechanism

If you have any concerns regarding data privacy, you may contact our Grievance Officer:

- **Name:** Ms. Nishma Desai
- **Email:** compliance@pravia.in
- **Phone:** +91 9004139937

If your grievance is not resolved within 30 days, you may approach the **SEBI SCORES** platform (scores.gov.in) or the **Online Dispute Resolution (ODR)** Portal.