

PRIVACY POLICY

Policy on Privacy and Security of Information

We, at Diviniti SIF, respect investors' right to privacy.

We recognise that the lawful and correct treatment of personal data is very important to maintain investor's confidence in ourselves.

It is our endeavour to ensure that any personal data that we collect, process, record or use in any way whether it is held on paper, on computer or other electronic media will have appropriate safeguards in place to comply with our obligations of confidentiality and privacy.

In this regard, we request investors to kindly read this "Policy on Privacy and Security of Information" carefully.

The terms as may be used in this document would be in accordance with "The Information Technology Act 2000 as amended till date, Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011" and such other rules/regulations and Circulars as may be applicable.

Interpretation

- All references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa. All references to investor whether masculine or feminine include references to non-individuals also unless repugnant to the context thereof;
- Any reference to any statute or statutory provision shall be construed as including a reference to any statutory modifications or re-enactment therein from time to time;
- Headings are for ease of reference only.

The Policy

ITI Asset Management Limited ('AMC'), a Company incorporated under the Companies Act, 1956, has been appointed as the Investment Manager to the Scheme of ITI Mutual Fund. ITI Mutual Fund Trustee Private Limited ('Trustee Company') is the Trustee to the Mutual Fund. The Investment Trust of India Limited and ITI Credit Limited are the Sponsors of the Mutual Fund.

The AMC either directly or through third party service providers engaged by the AMC (Service Providers) such as the Registrar and Transfer agents collects, receives, possesses, stores, deals or handles information received from investors whether existing or prospective.

Such information can be personal and sensitive in nature as per the indicative list given below:

- Bank Account details, change of bank account details or registration of multiple bank accounts etc. through application forms;

- Payment instrument details at the time of submitting application at the time of investment or as proof for carrying out change of bank account or any other details of debit card obtained (if any);
- Generation and storing password (PIN) in encrypted form based on the request from the investor under the online mode of investments;
- Biometric information obtained, if any;
- Demat Account details like beneficiary account no. etc.;
- Annual Income and savings profile; and
- Other information as may be considered as sensitive and personal.

The aforesaid information is being collected by the AMC/Service Providers to respond to your requests, to process the investment applications and to also ensure safe subscriptions/redemptions through points of acceptance in physical form, website, online portals, Automated Teller Machines and such other mode. The AMC may also call the investors to inform them with respect to the other products or services offered by the AMC. The said information is also being collected to be compliant with the Know Your Client (KYC) norms under the Prevention of Money Laundering Act, 2002, (PMLA), the rules issued there under, and guidelines and circular on Anti- Money Laundering issued by SEBI and SEBI (Mutual Funds) Regulations, 1996 as amended till date.

The aforesaid information is the basis of our ability to provide investors with good, qualitative, timely and efficient service, while also keeping the information and data provided totally secure and confidential.

We endeavour to have suitable technical, operational and physical security controls and measures to protect investors personal/sensitive data or information that are commensurate with the nature of our business at all times.

We permit only authorized employees who are trained in the proper handling of investor information, to have access to aforesaid information. We would ensure to enter into suitable terms with third party service providers in order to protect investor confidentiality and follow a non-disclosure or restricted disclosure policy. Further, the employees who violate the privacy and confidentiality promise shall be subjected to disciplinary action.

We shall reveal only such information to external authorities as may be found relevant and necessary in order to comply with the applicable laws of the land and to third party service providers to ensure smooth functioning of the activities as may be prescribed under applicable laws like Registrar and Transfer Agents/distributors/banks/sub-brokers/call-centers/custodians/depositories and such other entities/persons. By using our website or by agreeing to transact with us, you agree to the above sharing of information during your relationship with us. We may also be required from time to time to disclose investor's personal information to governmental or judicial bodies or agencies or our regulators based on their requirement to comply with the applicable laws including cyber laws. In addition to the above we may also use the information shared by investors to contact investors regarding the products and services offered by us and seek feedback on the services provided. Further, such information may also be used by us to generate statistics and reports and/or to protect and defend the rights, interest and property of the Mutual Fund, AMC, Trustee Company, Sponsors & its affiliates and directors and/or to enforce legal rights or provisions of the Investment strategy related Documents of Diviniti SIF viz. Investment strategy Information Document (ISID), Statement of Additional Information (SAI) and Key Information Memorandum (KIM).

Further, it may be noted that Internet Protocol (IP) addresses, browser supplied information and site session information may be recorded as part of the normal operations and for security monitoring purposes.

Nevertheless, it is our foremost endeavour to ensure that the Investor's Privacy is protected at all points in time. The investors (whether existing/prospective) must ensure to recheck the information or data being provided to the AMC or any person acting on its behalf. In case if any of the data/information is found to be inaccurate or incorrect, the same shall be informed to the AMC for immediate amendment. The AMC and any person acting on its behalf shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by the investors (whether existing/prospective).

Our website may use cookies. By using our website and agreeing to these terms of use, you consent to our use of cookies in accordance with the terms of our privacy policy.

Investors shall not be covered by the terms of this Policy if they access other websites using links from this website.

Further, despite our efforts to protect investor's privacy, if unauthorized persons breach security control measures and illegally use such sensitive/personal data or information, the Mutual Fund, AMC, Trustee Company, Sponsors and its affiliates and directors shall not be held responsible/liable.

Amendments/Modifications

This Privacy Policy available on our website is current and valid. However, the Diviniti SIF/AMC reserves the right to amend/modify any of the sections of this policy at any time and the investors are requested to keep themselves updated for changes by reading the same from time to time.

Retention of information/data

It may be noted that we may retain the data as may be provided by the investors till such time as may be provided under the law and as required to efficiently provide service to the investors.

Grievance redressal

If investors have any concerns relating to their personal and sensitive information, they may be addressed to Ms. Nimisha Keny, Investor Relation Officer, Contact No. 022 69153500, Email Id – contact.sif@itiorg.com. For more details, please refer to the Investment strategy related documents available on our website viz. <https://sif.itiamc.com/>

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