

SAURIN INVESTMENTS PVT. LTD.

Official Privacy Policy

Website: www.saurinonline.com | Compliance & Operational Documentation

Welcome to **Saurin Investments Pvt. Ltd.** The domain name **www.saurinonline.com** (hereinafter referred to as the "**Website**"), along with related mobile applications and trading portals, is owned and operated by **Saurin Investments Pvt. Ltd.**, a company incorporated under the Companies Act with its registered office at '**SIPL House**', **14, Bhagwan Nagar Tekro, Paldi, Ahmedabad – 380007, Gujarat, India** (hereinafter referred to as "**SAURIN INVESTMENTS**", "**We**", "**Us**", or "**Our**").

This policy covers the collection, processing, storage, access, and transfer of information required under lawful and contractual obligations with SAURIN INVESTMENTS or otherwise necessary in the normal course of stock broking and related financial market services. It fulfills the statutory requirements established under:

- The Information Technology Act, 2000 – Section 43A;
- The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011;
- The Digital Personal Data Protection Act, 2023 (DPDP Act); and
- Rules, regulations, notifications, and circulars issued by the Securities and Exchange Board of India (SEBI) and recognized Stock Exchanges.

For the purpose of this Privacy Policy, wherever the context so requires, the term "**You**", "**Your**", or "**User**" refers to any natural or legal person, including online and offline clients, prospective investors, and casual visitors to **www.saurinonline.com**.

1. COMMITMENT TO PRIVACY & SECURITY

We at SAURIN INVESTMENTS respect the privacy of everyone who accesses **www.saurinonline.com** or our related trading software and are committed to safeguarding personal and sensitive information.

We store and process your information—including sensitive personal data and financial records—on systems protected by physical, operational, and technological security safeguards in accordance with Indian regulatory frameworks. If you do not agree with your information being collected, processed, or utilized as described herein, please do not provide your details on **www.saurinonline.com** or use our trading platforms.

2. COLLECTION OF SENSITIVE PERSONAL DATA OR INFORMATION (SPDI)

To execute trades, fulfill statutory KYC mandates, and maintain regulatory compliance, SAURIN INVESTMENTS may collect and process:

- **Personal & Demographic Details:** Full Name, Gender, Residential / Correspondence Address, Contact Numbers, Date of Birth, Marital Status, Father's/Spouse's Name, and Email Address.
- **Identity & Verification Data:** Permanent Account Number (PAN), Aadhaar details (masked format via UIDAI-compliant e-Sign/DigiLocker), KYC compliance status, specimen signatures, photographs, and In-Person Verification (IPV) video records.
- **Financial & Settlement Data:** Linked Bank Account Numbers, IFSC, Demat Account details (DP ID / Client ID), financial proof (ITR, Form 16, net-worth certificates, or bank statements required for derivatives segment enablement).
- **Audit Trail & Technical Data:** IP addresses, browser types, device identifiers, geolocation data captured during order placement, access timestamps, and order/trade logs as mandated under SEBI audit trail directives.

Note: Any information freely available or accessible in the public domain or furnished under the Right to Information Act, 2005, or any other prevailing law shall not be considered sensitive personal information.

3. PURPOSE OF PROCESSING & REGULATORY DISCLOSURE

SAURIN INVESTMENTS uses collected data strictly for lawful and operational purposes:

1. **Trade Execution & Client Servicing:** Onboarding clients, routing buy/sell orders, clearing and settling market transactions, managing margin systems, and delivering contract notes and financial statements.
2. **Statutory & Regulatory Disclosures:** As a regulated intermediary, SAURIN INVESTMENTS is legally bound to disclose relevant client records without prior consent to:
 - Securities and Exchange Board of India (SEBI);
 - Stock Exchanges (NSE, BSE, MCX);
 - Clearing Corporations and Depositories (CDSL / NSDL);
 - KYC Registration Agencies (KRAs) and CERSAI (CKYC);
 - Asset Management Companies (AMCs) and Registrar & Transfer Agents (RTAs);
 - Designated banking partners and clearing payment gateways; and
 - Judicial bodies, tax authorities, and law enforcement agencies upon valid statutory notice.
3. **Corporate Reorganization:** In the event of a merger, acquisition, amalgamation, or restructuring, client records may be transferred to the successor legal entity subject to regulatory adherence and confidentiality obligations.

Non-Commercialization Commitment: SAURIN INVESTMENTS does not sell, rent, license, or lease client personal data to third-party marketing or advertising networks.

4. DATA RETENTION PERIOD

Under the **Prevention of Money Laundering Act, 2002 (PMLA)** and SEBI statutory norms, client identity records, financial proofs, transaction logs, and communication archives must be preserved for a mandatory minimum period of **5 (five) years** following the termination of the client relationship or account closure.

5. CLIENT RIGHTS: REVIEW & CONSENT REVOCATION

- **Accuracy of Data:** The client is responsible for providing true, current, and complete information. Neither SAURIN INVESTMENTS nor its staff shall be held liable for errors arising from inaccurate or outdated details supplied by the client.
- **Review & Correction:** You may request a review of your personal information to rectify inaccuracies by submitting a written request to our compliance desk.
- **Consent Revocation:** You retain the right to revoke consent for data processing. Because identity verification and financial recordkeeping are statutory conditions for operating a trading account, revoking consent will require the immediate freezing and eventual closure of your trading account.

6. ELECTRONIC COMMUNICATIONS

By accessing **www.saurinonline.com** or transacting on our trading systems, you agree to receive communications electronically. SAURIN INVESTMENTS communicates via registered email, SMS, WhatsApp, and notices posted directly on **www.saurinonline.com**. Electronic Contract Notes (ECNs) sent to your registered email carry full legal validity under SEBI guidelines.

7. INFORMATION SECURITY PRACTICES

SAURIN INVESTMENTS maintains commercially reasonable physical, technical, and administrative safeguards—such as SSL/TLS data encryption, firewalls, role-based database permissions, and multi-factor authentication—to protect your personal information from unauthorized access, alteration, or disclosure.

Users are responsible for safeguarding their login credentials, passwords, PINs, and OTPs. SAURIN INVESTMENTS will never contact you to ask for your confidential trading password or 2FA PIN.

8. EXTERNAL THIRD-PARTY LINKS

www.saurinonline.com may contain links to external portals (such as banking payment gateways, exchange websites, or regulatory portals). SAURIN INVESTMENTS has no control over the privacy standards of external websites. Users are advised to review the respective privacy statements of external sites before submitting sensitive data.

9. EXCHANGE DISCLAIMER (ITORS CLAUSE)

“The Stock Exchanges (including BSE, NSE, and MCX) and SEBI are not in any manner answerable, responsible, or liable to any person or persons for any acts of omission or commission, errors, mistakes, and/or violations, actual or perceived, by Saurin Investments Pvt. Ltd. or its partners, directors, agents, or associates, of any Rules, Regulations, Bye-laws of the Exchanges, SEBI Act, or other applicable laws in force from time to time. The Stock Exchanges are not answerable, responsible, or liable for any information on this Website (www.saurinonline.com) or for any services rendered by our employees or representatives.”

10. POLICY UPDATES

SAURIN INVESTMENTS reserves the right to amend this Privacy Policy at its discretion to align with regulatory amendments or technological enhancements. Updated policies will be posted on **www.saurinonline.com** with the revised effective date. Continued use of our portal and services indicates acceptance of the amended terms.