

# Privacy policy

## EUREKA

In the course of using this website or any of the websites under the 'eurekasec' / 'eurekasecurities' domain or availing the products and services vide the online application forms and questionnaires, online consents and such other details required from time to time on any of Eureka's (and/or its affiliates) web platforms or mobile applications, Eureka and/or its affiliates may become privy to some of Your personal information, including which may or may not be of confidential nature. Eureka is strongly committed to protecting the privacy of its users/clients and has taken all necessary and reasonable measures to protect the confidentiality of any customer information.

For the purpose of these Privacy Policy, wherever the context so mentions "Covered Persons", "Client", "You" or "Your", it shall mean any natural or legal person who has visited this website/platform and/or has agreed to or has enquired open an account and/or initiated the process of opening an account with Eureka (also defined as "Covered Persons").

Eureka allows any person to use/visit/browse the website without registering on the website. The term "We", "Us" , "Our" and "Team Eureka" shall mean Eureka Stock & Share Broking Services Limited and its group of companies. Eureka Stock & Share Broking Services Limited and/or its group of companies (hereinafter shall be referred together as 'Eureka'). Eureka Stock & Share Broking Services Ltd. is an ISO 9001:2015 certified company (certificate no: IND.20.6217/QM/U). SEBI Single Registration Number : INZ000169839 [ NSECM, FO (TM & CM), CD (TM & CM), BSE CM, FO (TM), CD(TM), MSEICM, FO(TM) CD(TM), MCX(TM & CM), NSE & BSE COMMODITY] Registered Member Code: 00684 (NSE), 906 (BSE), 36100 (MSEI), 56480 (MCX), 01288 (NCDEX). NSDL : IN-DP-NSDL-172-2000 DP NO: IN302105 CDSL: IN-DP-CDSL-460-2008 DP NO: 12055800. PMS – Eureka Portfolio Management Services Ltd. INP000005740. This website is owned, operated and maintained by 'Eureka Stock & Share Broking Services Ltd', a Company having CIN: U70109WB1992PLC055782, and having its Registered Office at 1101, Merlin Infinite, DN 51, Salt Lake City, Sector 5, Kolkata 700091. Access to Your Eureka account and the usage of Your account is subject to Your compliance with all the terms and conditions set forth herein, read along with all documents, including but not limited to; applications forms and undertakings, signed by you during account opening, and any terms/consents/policies included on Eureka's website/domain, including its "Terms and Conditions", "Policies & Procedures", and "Disclosure".

### Scope of this Policy

Any natural or legal person who has visited the Eureka website/platform and/or the mobile application, and/or who may or may not have further agreed to initiate the process of opening an account with Eureka shall come under the purview of the scope of this Privacy Policy. Eureka shall at all times follow all such rules prescribed under the Information Technology Act, 2000, and rules & procedural guidelines

set by the Securities Exchange Board of India (“SEBI”) and/or any of its regulated entities/intermediaries that Eureka is a member of.

### **Collection and use of your personal information**

Eureka may or may not collect your Personal Information to provide services on its web based platform or mobile application. While opening a trading and demat account with Eureka, you may be asked for certain Sensitive Personal Data or Information (as defined under the Information Technology Act, 2000) to complete your KYC (as per the ‘Know Your Client’ requirements set by SEBI) and as per the Prevention of Money Laundering Act, 2002.

Eureka, may or may not, request for sensitive information from You at the time of account opening, which would include but not be limited to, (i) setting a password; (ii) financial information such as Bank account or credit card or debit card or other payment instrument details; (iii) information such as name, contact number, gender, date of birth, residence and employment addresses, father’s/mother’s and spouses names, bank account details, scans/copies of document proofs of address & identity such as Photograph, PAN, passport, drivers license, Aadhaar (voluntarily) etc. (iv) uploading signature proof/photo etc. All such information would be for the purpose of: identity verification and background checking for account opening as per KYC & AML Rules, personalising services offered to you, keeping you updated of our products and services relevant to you, information pertaining to our services you’ve subscribed to, and for any legal and regulatory / audit purposes.

Under Regulation 5 of the Information Technology (Reasonable Security and Procedures and Sensitive Personal Data or Information) Rules, 2011, Eureka is obliged to provide every registered user of Eureka with a readable copy of the personal information you have provided us.

We would save such information as required by the law, and as directed by the regulators along with such intermediaries regulated by them, for the purpose of offering You our services, and for such further regulatory, audit, and business purposes. We collect Personal Information from you only when you voluntarily use the services provided by Eureka, and/or enquire to begin an association with Eureka and/or complete the process of opening an account with Eureka.

With regard to security, we respect all information provided to us, and take all reasonable steps towards protection of the same. We have implemented technology and policies, with the objective of protecting your privacy from unauthorized access and improper use, and periodically review the same. We maintain procedural safeguards to protect the confidentiality and security of personally identifiable information transmitted to us.

## **Aadhaar user consent policy**

### **Voluntary Act**

The act of providing your Aadhaar is voluntary in nature, which will only be required for completing your account opening procedure online and for digitally signing the Eureka account opening form. Your Aadhaar may also be used as a proof of address as an alternative choice to drivers license or Passport copy, which is a voluntary decision to be made by You.

You may alternatively choose to go through the offline route of account opening by physically signing all such account opening documents, which does not require you to share your Aadhaar information at all.

Eureka does not store any Aadhaar information

During your online account opening process, you do not input any Aadhaar details on the Eureka platform. You would be issuing your Digital Aadhaar to Digilocker, from where Eureka (Eureka is registered as a Requester on the Digilocker platform) would receive information, based on your consent to allow Digilocker to share such information with Eureka, limited to: (1) The last four digits of your Aadhaar / VID (Virtual ID created on the UIDAI website), (2) Full Name, (3) Date of Birth, (4) Gender, (5) Address, and (6) Your Photo.

Digilocker is a part of the National eGovernance Division under the Ministry of Electronics & Information Technology (MeitY), Government of India. The Digital Aadhaar issued within DigiLocker is the same as the eAadhaar issued by UIDAI (<https://aadhaar.uidai.gov.in>). DigiLocker has partnered with UIDAI to make it available automatically to its users when they link their DigiLocker account with Aadhaar. This act of issuing an eAadhaar within Digilocker and subsequently Digilocker sharing the information limited to the above points, leads to behaving as a physical KYC. Eureka only receives information limited to the above points for the purposes of completing KYC of clients online.

All clients may alternatively follow the offline route of account opening, which does not require sharing any Aadhaar related information.

During your online account opening process, you would also be sharing your Aadhaar with Protean eGov Technologies Ltd. for the purpose of digitally signing the Eureka account opening form. Protean eGov Technologies Ltd. does not share your Aadhaar with Eureka. After the account opening form has been digitally signed by you, a copy of the digitally signed form would be emailed to you and to Eureka for reference/audit purposes. Protean eGov Technologies Ltd. is a licensed e-Sign ASP (Application Services Provider) with CDAC, compliant with the guidelines laid down by the Controller of Certifying Authorities (CCA), India and UIDAI, to enable you to eSign the account opening forms online.

## **Collection and use of your non-personal information**

Eureka may from time to time collect information, i.e. Non-personal information which cannot be used to identify you personally, while You are using the website or mobile application. Eureka may from time to time collect information such as Non-personal information such as IP (internet protocol) addresses, browser types, the name of your ISP (internet service provider), information about a third party link/URL from where You arrive to our website/mobile application, which pages/URLs do You click on the Eureka website / mobile application, and the amount of time spent on each.

Eureka uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses first-party cookies to report on user interactions with our web-based services. These cookies store non-personally identifiable information.

## **Usage of Cookies**

Eureka may from time to time use cookies. Cookies are small data files that a website stores on Your computer. Eureka may use persistent cookies which are permanently placed on your computer to store non-personal (Browser, ISP, OS, Clickstream information etc) and profiling information (age, gender, income etc). While cookies have unique identification nos, personal information (name, a/c no, contact nos etc) shall not be stored on the cookies. We will use the information stored in the cookies to improve Your browsing experience on our website, by throwing up relevant content where possible. We will also use the cookies to store visitor preferences to ease visitor navigation on the site.

## **Disclosure and transfer of collected information**

Eureka does not share any of your information with third parties except: (i) with respect to providing the information or services that you have requested earlier, (ii) or with your express permission for sharing such information, or (iii) with intermediaries/applications who require such information as per regulatory requirements and procedure laid down by SEBI/Exchanges.

Under no circumstances will we sell or rent your personal information to anyone, for any reason, at any time. Eureka has taken best and reasonable steps to ensure prevention of any unauthorised disclosure of your sensitive personal information.

Disclosure for regulatory compliances: Eureka will share your information with judicial, administrative and regulatory entities to comply with any legal and regulatory requirements.

Disclosures with your prior consent: If, at any time, you choose to utilise the integrated services of third party service partners through us, we will share your information with these third party service partners with your prior consent.

Disclosure for provision of services: Eureka will share your information with third party vendors of Eureka as necessary for the provision of services. Authorized third party vendors are bound by the same standards of data security practices and procedures as we are under law and contract. They are subject to the same penalties as we are for the unauthorised disclosure of your personal information.

## **Security**

Our hosting services and servers maintain its systems in accordance with industry standards and best practices to reasonably secure the information of its customers, such as using SSL encryption in certain places to prevent eavesdropping, and employing up-to-date software on the server. However, no data transmission over the Internet can be guaranteed to be 100% secure. "Perfect security" does not exist on the Internet, and therefore You use the website and mobile application at your own risk.

Your data is transmitted between your device and our servers using HTTPS protocol for encryption. HTTPS is the technology used to create secure connections for your web browser, and is indicated by a padlock icon in your browser.

Eureka follows industry best practices, using open and known principles when transferring and storing your data. We believe the biggest threat to the security and privacy of your data is if someone gains access to any of your devices. Remember to keep your password safe and secret to prevent unauthorised access to your Eureka account. If you think that the security of your Eureka account has been compromised, change your password and contact us immediately for further assistance.

## **Correction/Updating or Access to Personal Information**

In case of any changes with respect to any of your information, especially Personal Information has been changed or in case you would not like to continue the services of Eureka, then you would be required to either update your Personal Information or unsubscribe from any updates / information with respect to notifications on the products/services that you had earlier utilised or enquired upon at Eureka. In case you would like to modify / delete any details with respect to your Personal / Non-personal information, or to access your information in readable format, you would have to write to: (i) "care[@]eurekasec[.]com"" or to the address: Eureka, 1101, Merlin Infinite, DN 51, Salt Lake City, Sector 5, Kolkata 700091.

## **Subject to Change**

This Privacy Policy is subject to change and may be updated or revised from time to time, without any prior notification to the User, at the sole discretion of Eureka. It is the responsibility of the User to periodically review the Privacy Policy to determine whether there have been any revisions or updates. The last updated date of the Policy has been mentioned above for the reference of the User.

If you do not agree with the terms of this Privacy Policy or any changes made to this Policy, please stop using all products and services provided by Eureka immediately and write to us at email ID stated above.