



PRIVACY POLICY

Regulatory Reference	IT Act 2000 DPDP Act 2023 RBI Guidelines SEBI Guidelines
Applicability	All stakeholders, visitors to PCSL platforms
Data Fiduciary	Prompt Corporate Services Limited (PCSL)

1. Introduction

Prompt Corporate Services Limited ("PCSL", "we", "us" or "our") is committed to protecting the privacy and security of personal information entrusted to us by our clients, investors, employees and other stakeholders. This Privacy Policy has been formulated in accordance with the Information Technology Act, 2000, 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 guidelines issued by SEBI and RBI from time to time.

2. Information We Collect

2.1 Personal Information

- Identity information: Name, date of birth, gender, PAN, Aadhaar, Passport number.
- Contact information: Address, email address, phone number.
- Financial information: Bank account details, DEMAT account details, income details, net worth.
- Investment information: Portfolio details, trading history, risk profile.
- KYC information: Identity and address proof documents as required by SEBI and PMLA.

2.2 Non-Personal Information

- IP addresses and browser type.
- Pages visited and time spent on PCSL's website/application.
- Device information and operating system.
- Cookies and similar tracking technologies.

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Shalini Singhaia
Director



3. Purpose of Collection and Use

PCSL collects and uses personal information for the following purposes:

- Compliance with AML/CFT obligations under PMLA and SEBI guidelines.
- Risk management and fraud prevention.
- Communicating important notices, changes in policies or services.
- Marketing of our products and services (with customer consent where required).
- Improving our products, services and customer experience.
- Dispute resolution and legal compliance.

4. Legal Basis for Processing

PCSL processes personal data on the following legal bases:

- **Consent:** Where required by law or where we rely on your explicit consent.
- **Contractual Necessity:** To perform our obligations under our service agreements.
- **Legal Obligation:** To comply with applicable laws including PMLA, SEBI regulations, RBI guidelines.
- **Legitimate Interests:** For fraud prevention, risk management and improvement of services.

5. Data Sharing and Disclosure

PCSL may share personal information with:

- Regulatory authorities: SEBI, RBI, Stock Exchanges (NSE/BSE), FIU-IND, RoC, and other regulatory bodies as required by law.
- Depositories: NSDL and CDSL.
- Technology service providers and data processors engaged by PCSL.
- Legal and professional advisors.

PCSL does not sell personal information to third parties for commercial purposes.

6. Data Retention

PCSL retains personal information for the following periods:

- KYC/Account documents: 5 years after cessation of business relationship (as mandated by PMLA).
- Transaction records: 5 years from the date of transaction.
- Communication records: 3 years.
- Any records required to be maintained for longer periods under applicable law shall be retained accordingly.

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7. Data Security

PCSL implements appropriate technical and organizational measures to protect personal information against unauthorized access, alteration, disclosure or destruction. Measures include:

- Encryption of data in transit and at rest.
- Access controls and authentication mechanisms.
- Regular security audits and vulnerability assessments.
- Employee training on data security and privacy.
- Incident response procedures.

8. Data Principal Rights (Under DPDP Act 2023)

Under the Digital Personal Data Protection Act, 2023, individuals ('Data Principals') have the following rights:

- Right to Access: To obtain information about personal data being processed.
- Right to Correction and Erasure: To correct inaccurate or outdated data, and request erasure of data no longer needed.
- Right to Grievance Redressal: To have grievances addressed within the timelines prescribed.
- Right to Nominate: To nominate another individual who shall exercise these rights in the event of death or incapacity.

To exercise these rights, please write to us via mail promptcal@gmail.com.

9. Cookies Policy

PCSL's website uses cookies and similar technologies to enhance user experience. We use:

- Essential cookies: Necessary for the functioning of our website.
- Analytics cookies: To understand how users interact with our website.
- Preference cookies: To remember user preferences and settings.

Users may control cookie preferences through browser settings. Disabling certain cookies may affect website functionality.

10. Cross-Border Data Transfers

PCSL does not ordinarily transfer personal data outside India. Where such transfer is required for fulfilling service obligations (such as providing services to NRI clients), PCSL shall ensure that such transfers comply with the DPDP Act, 2023 and any applicable RBI/FEMA guidelines on cross-border data flows.

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11. Grievance Redressal and Contact

Any grievance relating to the processing of personal information may be addressed to:

Prompt Corporate Services Limited (PCSL)

CIN: U74140WB1994PLC061327

Email: promptcal@gmail.com

All grievances will be resolved expeditiously.

12. Updates to this Policy

PCSL reserves the right to update this Privacy Policy from time to time in accordance with changes in laws, regulations or business practices. Updated policies shall be posted on PCSL's website with the effective date of change. For material changes, PCSL shall notify registered users through email or other appropriate means.

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