

PRIVACY POLICY

Purpose

NEO Group (Holding Co., Neo Asset Management Private Limited, and Neo Multi – family Office) is engaged in providing various financial and ancillary services. In the course of its business and while dealing with Investors, investors and website users may become privy to your personal information including information that is confidential in nature.

For purpose of this Privacy Policy, wherever the context so requires the term "You" or "User" shall mean any natural or legal person including Online and offline investors and the term "We", "Us", "Our" shall mean NEO Group.

We at NEO Group respect the privacy of everyone who visits this website and are committed to maintaining the privacy and security of the personal information of all visitors to this Website. We view protection of your privacy as a very important principle. We understand clearly that You and Your Personal Information is one of our most important assets. We store and process Your Information including any sensitive financial information collected, if any, on computers that may be protected by physical as well as reasonable technological security measures and procedures. If you object to Your Information being transferred or used in this way, please do not provide the details of your information on the Website.

We keep ourselves abreast with the global trend and have updated this policy to capture requirement under GDPR (General Data Protection Regulation) as applicable to EU Customers.

NEO Group and its affiliates may share/transfer / license / convey some or all of your personal information with another business entity to carry out any business activity or re-organization, amalgamation, restructuring of business or for any other reason whatsoever. Once you provide your information to us, you provide such information to NEO Group and its affiliate and we and our affiliate may use such information to provide you various services with respect to your transaction conducted with NEO Group.

Our policy on the collection and use of personal information and other information is outlined below.

Collection Of Sensitive Personal Data Or Personal Information:

NEO Group may for purpose of rendering its services, collect personal information such as:

- Name, gender, residential / correspondence address, telephone number, date of birth, marital status, email address or other contact information;
- Identification Documents, KYC Status, Signature and Photograph;
- Bank account or other payment instrument details;
- any other detail for providing services
- Password

- Financial information such as Bank account, credit card, debit card or other payment instrument details

- Physical, physiological and mental health condition (iv) Sexual orientation (v) Medical records and history

- Biometric information

- any detail relating to the above clauses as provided to body corporate for providing service; and

- Any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise: provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act,

2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of Rules.

Information we may collect from your use of our services

- **Storage Information:** We may facilitate user to download and display information such as scheme commission details which a user may refer to, or to upload relevant documents as per various processes during user account management or transaction order placement
- **Media Information:** We facilitate users to capture / upload relevant documents as may be required to be uploaded during user account management or transaction order placement
- **Device Information:** We collect specific information about your device when you access our Services, including your storage, hardware model, operating system and version, unique device identifier, mobile network information, location, contacts and information about the device's interaction with our services

Neo Group offers online platform System for carrying out trade transactions that collects such personal data or information to process your financial and non-financial transaction requests. The information so collected may be shared with SEBI/ NSE/ BSE/ MCX /Asset Management Companies of Mutual Funds/Registrar and Transfer Agents/Collecting Banks/KYC Registration Agencies (KRAs), etc. solely for the purpose of processing your transaction requests or serving you better.

Disclosure of Customer Information:

Neo Group shall not deliberately disclose customer's personally identifiable information to any unauthorized third person. Save and except where such information shall be disclosed in good faith and for the purpose of law for the time being in force or to protect the rights and property of Neo Group. However, Neo Group has a right or duty to disclose or is permitted or compelled to so disclose such information by law, for the time being in force. For example, Neo Group may share/provide information with/to judicial bodies and regulatory authorities who have jurisdiction over Neo Group.

Children:

This website is not intended for use by children and minors. Parents are requested to ensure that Personal Information is not provided by minors.

NEO Group will continuously endeavour to ensure that Personal Data shall be used in line with all applicable data protection laws including GDPR. Your information will be kept secured with restricted access according to the 'need to know' principles.

NEO Group or its authorized agents shall not retain or store that information for longer than is required for the purposes except when the information may lawfully be used or is otherwise required under any other law for the time being in force.

The information collected shall be used for the purpose for which it has been collected.

By agreeing to avail the service offered by NEO Group you have agreed to the collection and use of your Sensitive Personal Data or Personal Information by NEO Group.

Right to Opt Out:

You always have the right to refuse or withdraw your consent to share/dissemination of your Sensitive Personal Data or Personal Information by contacting the customer care. However, in such an event, you would no longer avail the services of NEO Group. The withdrawal of consent shall not affect the lawfulness of processing of your data based on consent before its withdrawal. Thus opt out request would not be applicable to the correspondence and communications already initiated by NEO Group.

Communications:

When You use the Website or send emails or other data, information or communication to us, You agree and understand that You are communicating with Us through electronic records and You consent to receive communications via electronic records from Us periodically and as and when required. We may communicate with you by email or by such other mode of communication, electronic or otherwise.

Log File Information Collected And Stored Automatically (Cookies):

When you register with or view our site, our servers automatically record certain information that your web browser sends whenever you visit our website. The kind of information that is gathered automatically include the type of browser you are using (e.g. Internet Explorer, Firefox, etc.), the type of Operating System you are using (e.g. Windows or Mac OS) and the domain name of your Internet Service Provider, the date and time of your visit and the pages on our website. We sometimes use this information to improve our website(s) design, content and primarily to give you a better browsing experience.

This notice / policy is not intended to and do not create any contractual or other legal rights in favour of any user or viewer of this website or on behalf of any other party. However, users and viewers are informed that by using the website, they are deemed to have consented to the collection and use of information by NEO Group as stated above.

If you'd prefer to restrict, block or delete cookies from this website, or any other website, you can use your browser to do this. Each browser is different, so check the 'Help' menu of your particular browser to learn how to change your cookie preferences. If you choose to disable all cookies we cannot guarantee the performance of our website and some features may not work as expected.

Updating or Reviewing Your Sensitive Personal Data or Personal Information:

You may upon written request to us review the sensitive personal data or information provided. NEO Group shall ensure that any personal information or sensitive personal data or information found to be inaccurate or deficient shall be corrected or amended as feasible.

Reasonable Security Practices for Protecting Information:

NEO Group uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. NEO Group cannot, however, ensure or warrant the security of any information you transmit to NEO Group and you do so at your own risk. Once we receive your transmission of information, NEO Group makes commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

To protect your privacy and security, NEO Group take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for

maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from NEO Group, at all times.

Links to Other Web Sites:

Our website sometimes has links to other website(s) in the World Wide Web. The privacy policies of these website(s) are not under our control. Once you leave our servers, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting. It is advisable to read their privacy policies for further information. Your browsing and interaction on any other Web site, including those that have a link on our Web site, is subject to that Web site's own rules and policies. It is advisable to read their privacy policies for further information.

Notification Procedures:

NEO Group provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our Website page, as determined by NEO Group in its sole discretion. NEO Group reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.

Changes to Our Privacy Policy:

Please note that this policy may change from time to time. If NEO Group change its privacy policies and procedures, NEO Group will post those changes on NEO website to keep you/users aware of what information NEO Group collect, how NEO Group use it and under what circumstances NEO Group may disclose it. Changes to this Privacy Policy are effective when they are posted on this page. Please visit our website to keep yourself abreast of any changes to this policy.

Certain sections or pages on this site may contain separate privacy policy, which is in addition to this privacy policy. In the event of any conflict between the two, the additional privacy policy will govern those sections or pages.

Date :