**Privacy Statement**

Pioneer Investcorp Limited (Hereinafter “PINC”) is a SEBI Registered Merchant Banker (SEBI Reg. no.INM000002988) since 1993, and a integrated financial advisors, we help you to explore opportunities in the mid market segment.

**Scope Of The Statement**

This Privacy Statement ("Statement") explains PINC information processing practices. It applies to any Client information you provide to PINC and any Client information we collect from other sources. This Statement is a statement of our practices and of your rights regarding your Client information. This is not a contractual document, and it does not create any rights or obligations on either party beyond those which already exist under data protection laws.

This Statement does not apply to your use of a third party site linked to on this website.

**Responsibility of your information**

Throughout this Statement, "PINC" refers to Pioneer Investcorp Limited, including its affiliated companies and subsidiaries (also referred to as "we", "us", or "our").

Some of the services which PINC provides to its clients are provided as a Advisors/consultant, which means that the Client remains primarily responsible for your information. In these circumstances, we may re-direct a query about our use of your information to our client.

**Quick read:**

PINC collects Client / commercial information from its clients (about their employees and customers) to provide solutions in the form of structured Debt and Private Equity Advisory Services. PINC also collects some Clients information directly, for example over its websites and applications.

PINC uses Clients information to deliver services to clients. For its own purposes, it also uses Clients information to analyse and improve how it delivers those services, to contact representatives of its clients or prospective clients and to market them.

If PINC uses your Client information, you will have certain important rights which you can exercise. The rights you will be able to exercise will depend on how and why PINC uses your information.

The primary point of contact at PINC for questions regarding your Client information is, 1218, 12th Floor, Maker Chamber V, Mumbai – 400021, Maharashtra, India.

**Collection of Information**

PINC collects Client information in the following ways:

* **When we perform services for our clients.** Our services and products include structured Debt, Private Equity Advisory Services for mid market segments.
* **When you request a service from us.** For example, if you ask us to obtain Advisory / consultancy services on your behalf, or if you contact us as a representative of your employer to enquire about a professional service you would like us to offer to your company.
* **When you register with or use any of our websites or applications.**
* **When you visit PINC site or attend an event.** You may provide this information directly, or it may be provided by your employer or colleagues.
* **When you apply for a position at PINC.** You may provide this information directly (through an online recruitment portal, careers site or via correspondence), or it may be provided via an agency.
* **If you contact us with a complaint or query.**
* **When you engage with us over social media.**

More information about the Client information collected for each of our services, together with the purpose and legal basis for collecting the information, will be provided to you in separate privacy notices, which are relevant to the services which affect you.

We will not collect any sensitive information through our website unless this is required. Sensitive information includes a number of types of data relating to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. We suggest that you do not provide sensitive information of this nature unless we specifically request this information.

If you provide us with sensitive Client information, you understand and give your explicit consent that we may collect, use and disclose this information to appropriate third parties for the purposes described in this Statement. If you provide Client information about other individuals such as employees or dependents, you must obtain their consent prior to your disclosure to us.

*Information we collect over PINC Sites, Mobile Applications and Social Media*

For purposes of this Statement, "website" includes our mobile application.

We may ask you for some or all of the following types of information when you register for events, request services, manage accounts, access various content and features or directly visit our websites. This includes, but is not limited to:

* Contact information, such as name, e-mail address, postal address, phone number and mobile number;
* User name, password, password reminder questions and password answers;
* Communication preferences, such as which newsletters you would like to receive;
* Search queries;
* Contact information about others when you refer a friend to a particular site or service (note: this information is used solely to facilitate requested communications); and
* Information posted in community discussions and other interactive online features.

In some instances, we automatically collect certain types of information when you visit our websites and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons.

*Social Media*

You can engage with us through social media websites or through features such as plug-ins or applications on PINC Sites that integrate with social media sites. You may also choose to link your account with us to third party social media sites. When you link your account or engage with us on or through third party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make).

If you post information when you interact with our websites through social media sites, plug-ins or other applications, depending on your privacy settings, this information may become public on the Internet. You can control what information you share through privacy settings available on some social media sites. For more information about how you can customize your privacy settings and how third party social media sites handle your Cliently identifiable information, please refer to their privacy help guides, privacy notices and terms of use.

**Use of Client Information**

The following is a summary of the purposes for which we use Client information. More information about the Client information collected for each of our services, together with the purpose and legal basis for collecting the information, will be provided to you in separate privacy notices which are relevant to the services which affect you.

*Performing services for our clients*

We process Client information which our clients provide to us in order to perform our professional consultancy and advisory services. This may impact you, for example, where you are the employee of our client. The precise purposes for which your Client information is processed will be determined by the scope and specification of our client engagement, and by applicable laws, regulatory guidance and professional standards. It is the obligation of our client to ensure that you understand that your Client information will be disclosed to PINC.

*Administering our client engagements*

We process Client information about our clients and the individual representatives of our corporate clients in order to:

* carry out "Know Your Client" checks and screening prior to starting a new engagement;
* carry out client communication, service, billing and administration;
* deal with client complaints;

*Contacting and marketing our clients and prospective clients*

We process Client information about our clients and the individual representatives of our corporate clients in order to:

* contact our clients in relation to current, future and proposed engagements;
* send our clients newsletters, know-how, promotional material and other marketing communications;
* invite our clients to events (and arrange and administer those events).

*Conducting data analytics*

PINC is an innovative business, which relies on developing sophisticated Advisory services by drawing on our experience from prior engagements. PINC is not concerned with an analysis of identifiable individuals, and we take steps to ensure that your rights and the legitimacy of PINC's activities are ensured through the use of aggregated or otherwise de-identified data.

*Other uses*

* Provide information and services as requested by you;
* Determine eligibility and process applications for products and services;
* Provide information and services as requested by clients;
* Understand and assess clients' ongoing needs and offer products and services to meet those needs;
* Conduct data analysis;
* Execute monitoring and training;
* Develop new services;
* Market products and services (subject to appropriate consent); and
* Conduct processing necessary to fulfill other contractual obligations for the individual.

If we wish to use your Client information for a purpose which is not compatible with the purpose for which it was collected for, we will request your consent. In all cases, we balance our legal use of your Client information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your Client information is not subject to unnecessary risk.

*Legal basis*

All processing or use of your Client information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

* the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract (e.g. where we help an employer to fulfill an obligation to you under an employment contract in relation to the delivery of employee benefits);
* the processing is necessary for us to comply with a relevant legal obligation (e.g. where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators); or
* the processing is in our legitimate commercial interests, subject to your interests and fundamental rights (e.g. where we use Client information provided to us by our clients to deliver our services, and that processing is not necessary in relation to a contract to which you are a party).

In limited circumstances, we will use your consent as the basis for processing your Client information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

Before collecting and/or using any special categories of data, we will establish a lawful exemption which will allow us to use that information. This exemption will typically be:

* your explicit consent;
* the establishment, exercise or defense by us or third parties of legal claims; or

**Information from Children**

Our websites are not directed to children and we do not knowingly collect Client information from children on our websites. Children are prohibited from using our websites.

**Retention of Your Client Information**

How long we retain your Client information depends on the purpose for which it was obtained and its nature. We will keep your Client information for the period necessary to fulfill the purposes described in this Statement unless a longer retention period is permitted by law and in accordance with the PINC Record Retention Policy.

In specific circumstances we may store your Client information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Client information or dealings.

**Disclosure of Information**

*Within PINC*

We may share your Client information with other PINC divisions to serve you, including for the activities listed above.

We do not rent, sell or otherwise disclose Client information about our online visitors with unaffiliated third parties for their own marketing use. We do not share your Client information with third parties except in the following circumstances discussed below.

*Business Partners*

We disclose Client information to business partners who provide certain specialized services to us, or who co-operate with us on projects. These business partners operate as separate controllers, and are responsible for their own compliance with relevant laws. You should refer to their privacy notices for more information about their practices.

Examples include:

* *Banking and finance products*- credit and fraud reporting agencies, debt collection agencies, insurers, reinsurers, and managed fund organizations for financial planning, investment products and trustee or custodial services in which you invest.

*Authorized Service Providers*

We may disclose your information to service providers we have retained (as processors) to perform services on our behalf (either in relation to services performed for our clients, or information which PINC uses for its own purposes, such as marketing). These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, ‘Use of Client Information.’

Examples include:

* IT service providers who manage our IT and back office systems and telecommunications networks;
* marketing automation providers;
* contact center providers.

These third parties appropriately safeguard your data, and their activities are limited to the purposes for which your data was provided.

*Legal Requirements and Business Transfers*

We may disclose Client information

1. if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request.
2. in response to law enforcement authority or other government official requests,
3. when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss,
4. in connection with an investigation of suspected or actual illegal activity or
5. in the event that PINC is subject to a merger or acquisition to the new owner of the business.

Disclosure may also be required for company audits or to investigate a complaint or security threat.

**Transmission of Information Collected**

Our organization has its footprint across India and business across the globe and may transfer certain Client information across geographical borders to PINC entities, authorized service providers or business partners in India and other countries working on our behalf in accordance with applicable laws. Our affiliates and third parties may be based locally or they may be overseas.

When we do, we use a variety of legal mechanisms to help ensure your rights and protections travel with your data:

* we ensure transfers within PINC are covered by agreements based on the standard contractual clauses as per Indian Laws, which contractually oblige each member to ensure that Client information receives an adequate and consistent level of protection wherever it resides within PINC;
* where we transfer your Client information outside PINC or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your Client information; or
* where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any Client information are disclosed.

If you would like further information about whether your information will be disclosed to overseas recipients, please contact us as noted below. You also have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments, which may be redacted for reasons of commercial confidentiality) to ensure the adequate protection of your Client information when this is transferred as mentioned above.

**Security for Protection of Information**

The security of your Client information is important to us and PINC has implemented reasonable physical, technical and administrative security standards to protect Client information from loss, misuse, alteration or destruction. We protect your Client information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your Client information, and they receive training about the importance of protecting Client information.

Our service providers and agents are contractually bound to maintain the confidentiality of Client information and may not use the information for any unauthorized purpose.

**What choices do you have about your Client information?**

We offer certain choices about how we communicate with our customers and what Client information we obtain about them and share with others. When you provide us with Client details, if we intend to use those details for marketing purposes, we will provide you with the option of whether you wish to receive promotional e-mail, SMS messages, telephone calls and postal mail from us. At any time, you may opt out from receiving interest-based advertising from us by contacting us.

**How can you update your communication preferences?**

We take reasonable steps to provide you with communication about your information. You can update your communication preferences in the following ways.

* Profile

If you have created a profile or account on one of our websites, you can update your contact information after you log into your account.

* Newsletters

If you request electronic communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in the communication.

* Mobile Devices

If you previously chose to receive push notifications on your mobile device from us but no longer wish to receive them, you can manage your preferences either through your device or the application settings. If you no longer wish to have any information collected by the mobile application, you may uninstall the application by using the uninstall process available on your mobile device.

* E-mail

Contact us by e-mail or postal address as noted below. Please include your current contact information, the information you are interested in accessing and your requested changes.

If we do not provide you with access, we will provide you with the reason for refusal and inform you of any exceptions relied upon.

**Other rights regarding your data**

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your Client information.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the Client information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfill your request.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

*Right to Access*

You have right to access Client information which PINC holds about you. If you have created a profile, you can access that information by visiting your account.

*Right to Rectification*

You have a right to request us to correct your Client information where it is inaccurate or out of date.

*Right to be Forgotten (Right to Erasure)*

You have the right under certain circumstances to have your Client information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.

*Right to Restrict Processing*

You have the right to restrict the processing of your Client information, but only where:

* its accuracy is contested, to allow us to verify its accuracy; or
* the processing is unlawful, but you do not want it erased; or
* it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
* you have exercised the right to object, and verification of overriding grounds is pending.

*Right to Data Portability*

You have the right to data portability, which requires us to provide Client information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

*Right to Object to Processing*

You have the right to object the processing of your Client information at any time, but only where that processing is has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

International Transfers

As noted above, you can ask to obtain a copy of, or reference to, the safeguards under which your Client information is transferred outside India.

**Cookies**

Our website uses cookies. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site and services.

**We may use cookies in the following ways:**

* Where they are essential to make our site work
* To enable the Clientisation features on our site (which give you the ability to recall recently viewed pages and see information which you have input online)
* To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our site. We cannot identify you Cliently in this way.

**Contact Us**

If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of the Act or this Statement, please contact the Privacy Officer: neha.plasterwala@pinc.co.in (Mrs. Neha Plasterwala).

**Grievance Officer:**

In accordance with the Information Technology Act, 2000 and the Information Technology (Intermediaries Guidelines) Rules, 2011 made thereunder, the name and contact details of the Grievance Officer are provided below:

Mrs. Snehal Chhaya

snehal.chhaya@pinc.co.in

www.pinc.co.in

Address at: -

1218, 12th Floor,

Maker Chamber V, Nariman Point,

Mumbai- 400021

Contact No.: 022-6618663

Timing: 9.30 am to 6pm

**Changes to this Statement**

We may update this Statement from time to time. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page.

We encourage you to periodically review this Statement so that you will be aware of our privacy practices.

This Statement was last updated on September 6, 2019.