

# NEML PRIVACY POLICY

This Privacy Policy explains how NCDEX e Markets Limited (hereinafter referred to as “We”, “Us”, “Our” or “NeML”, in so far as the context may so require) handles personal information that we collect online, through websites and applications (apps) and through our offline communications with you. This Privacy Policy does not apply to information collected from residents of countries other than India, or to third-party websites to which NeML may link.

Please read this Privacy Policy before using the NeML Services or submitting personal information to us.

While personal data or information is the cornerstone of our ability to provide superior service, our most important asset is our customers' trust. Keeping customer information secure and using it as our customers may so allow, is a top priority for us at NeML. This Privacy Policy covers inter alia, the type of personal information and purpose for which NeML collects and processes your personal information on NeML websites, platforms, servers, online marketplace and applications (together "NeML Services"). Your use of NeML Services are subject to this Privacy Policy and the Terms of Use.

Personal information” is information that directly or indirectly, individually or in combination with any other information is capable of identifying you as an individual or any other information that relates to an identifiable individual. A few examples of personal information include your name, postal address, telephone/mobile number among many others. Some categories of personal information, including but not limited to your financial information, passwords, sexual orientation, biometric information and other health information, qualifies as sensitive personal data or information as per the laws in India and have been afforded protection under applicable statutes. We are in compliance with all such applicable legislations and have implemented reasonable security practices and procedures within our organization. By using NeML Services you expressly agree to our use of your personal information in accordance with this Privacy Policy, as may be amended by us, from time to time. You also agree and consent to us collecting, storing, processing, transferring, and sharing your personal information with third parties or service providers for the purposes set out in this Privacy Policy.

## I. INFORMATION COLLECTED BY NeML

NeML collects your personal information in order to provide and continually improve its services. We receive and store any information you provide in relation to NeML membership and would collect and store the following information

1. Name
2. Address
3. Date of birth
4. Age
5. Contact Details
6. Pan Card Details
7. Aadhaar Details
8. User IDs and Password to access NeML Websites/ Application and related services
9. Financial information such as Bank Account or credit card or debit card or other payment instrument details
10. Trade related information as conducted on different NeML Platforms
11. Any other information that you may submit to us towards obtaining NeML membership for trading on NeML Platform

Your financial information, password and details regarding your official identifiers collected by us, may qualify as sensitive personal data or information under applicable legislations. However, we are legally obligated to collect this data in order to be able to cater our services to you. We maintain all reasonable standards as required by applicable legislations to protect and preserve your sensitive personal data or information. Your personal information is stored at our data centers in Mumbai, India.

## II. PURPOSE OF COLLECTING INFORMATION

NeML uses your personal information to enable it to issue membership so as to enable its users to operate, trade and settle transactions on NeML platform. These purposes include:

**Purchase and sale of commodities** -NeML uses your personal information to enable price discovery between buyers and sellers as well as for settlement of transactions on its Platform.

**Improve NeML Services**- NeML uses your personal information relating to your activity on our Website or Applications to assess your trading pattern, provide enhanced functionality, analyze obligation performance pattern, fix errors, and improve the usability and effectiveness of the NeML Services.

**Recommendations and personalization** - NeML uses your personal information to recommend products, and services that might be of interest to you, identify your preferences, and personalize your experience.

**Comply with legal obligations.** In certain cases, NeML collects and uses your personal information to comply with legislations, governmental or regulatory orders. Most of your sensitive personal data collected by us, is collected for this purpose.

**Communicate with you.** We use your personal information to communicate with you in relation to NeML Services via different channels (e.g. by phone, sms, whats-app, e-mail, chat etc). This may include communication needed to share transactional information with regards to your sale or purchase on the platform, or your use of our services. We may also use your contact details to inform you about our promotional offers and events.

**Credit Risk** - NeML may use your personal information to assess your credit scores and patterns which may be shared with third parties including Banks/Financial Institutions and/or financial intermediaries, from time to time.

**Trade Finance and Credit Limits** – NeML may use your personal information to share with Banks and Financial Institutions wherein you have requested for obtaining Trade Finance/ Credit Facilities towards funding of the trades conducted on NeML Platform.

## III. USAGE OF COOKIES AND OTHER IDENTIFIERS

NeML uses cookies, pixels, and other technologies (collectively, "cookies") to recognize your browser or device, learn more about your trades conducted, and provide you with essential features and services and for additional purposes, including:

- Recognizing you when you sign-in to use our services. This allows us to provide you with recommendations, display personalized content, recognize you as a NeML User, enable you to and provide other customized features and services.
- Keeping track of your specified preferences.
- Conducting research and diagnostics to improve NeML's services.
- Endeavoring prevention of fraudulent or suspicious activity.
- Improving security.

## IV. SHARING OF PERSONAL INFORMATION WITH THIRD PARTES

Personal Information of our members forms an important part of our business and we share our customers’ personal information with third parties only as described below:

**Transactions involving Third Parties**-NeML may share your personal information with Banks and Financial Institutions to enable Banks/Financial Institutions to contact you for offering Trade Finance/ Credit Facilities through funding of trades executed on NeML Platform.

**Trades involving Private and Government Agencies** – NeML shall share your personal information with Private and Government & Semi/Quasi Government Agencies wherein you have participated in auction initiated over NeML Platform by such entities.

**Third-Party Service Providers:** NeML may employ other entities and individuals to perform certain functions for its Members for which personal information may have to be shared by NeML with such third party service providers. Examples include transporters, assayers, warehouse service providers, SMS and e-mail service providers, data analytics, entities providing marketing assistance, payment processors etc. Such third-party service providers may have access to your personal information needed to perform their functions, but may not use it for other purposes. Further, such service providers have been apprised the need to maintain the personal information in accordance with applicable law

**Business Transfers/Takeovers/Mergers:** NeML might sell its business or engage in a takeover or a merger with another entity. In such transactions, personal information of the members generally form part of such business transfer/takeover/merger arrangements.

**Compliance with Statutory requirements/law enforcement agencies:** NeML may release personal information for compliance with the statutory/regulatory requirements or as may be directed by law enforcement agencies from time to time without seeking consent of the User.

## V. INFORMATION SECURITY

NeML designs its systems with your security and privacy in mind.

- NeML works to protect the security of your personal information during transmission by using encryption protocols and software.
- We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, processing, and disclosure of User information. NeML's security procedures mean that we may occasionally request proof of identity/change of passwords/ user authentication before we disclose personal information to you.
- Additionally, NeML has a comprehensive documented information security programme and information security policy (ISMS policy) that contain managerial, technical, operational and physical security control measures that are commensurate with the information assets being protected with the nature of business.
- NeML has obtained ISO 9001:2015 as well as ISO 27001:2013 certifications covering information security management system.

## VI. RETENTION OF INFORMATION

Your information shall be retained with NeML until such time you continue being a User with NeML/keep using our services. After you delete your account with us, your information will be retained by us in accordance with our record retention policies which is made in accordance with statutory directives.

## VII. USER DISCRETION

As part of compliance with members’ data privacy and personal information related regulations in place, users whose personal information has been stored by NeML shall have a right to review the personal information provided to us and can direct any changes/corrections to the same with documentary evidence. The User also has an option to not provide its personal information or withdraw its consent previously given. However, NeML shall have a right to not render NeML services for want of such personal information of Users.

## VIII. Grievance Redressal

If you choose to use NeML Services, your use is subject to this Privacy Policy & Terms of Use. If you have any concern about privacy at NeML, please contact our grievance officer with a thorough description, and NeML shall endeavor to resolve it. In the event of any changes in NeML business, our Privacy Policy may also undergo change. You should check our website frequently to see recent changes. Unless stated otherwise, NeML's current Privacy Policy applies to all information that we have about you and your account.

### Grievance Officer

Please find below the details of the grievance officer:

**Name:** Mr. Cyrus Singporewala

**Designation:** Grievance officer

**Email :** grievance\_redressal@neml.in