

Nubra refers to Zanskar Securities Private Limited (CIN: U64199KA2023PTC175635). Nubra is dedicated to respecting your privacy and preferences. This Privacy Statement (hereinafter referred to as the “Statement”) outlines our privacy practices concerning the Personal Information collected and processed, in accordance with applicable data privacy regulations.

We prioritise privacy and are dedicated to safeguarding personal information. This Privacy Policy details how we collect, use, and protect your data. This policy applies to the website or application. This policy applies to all the products, services, and businesses of Nubra. The terms of this policy may be in addition to the existing terms of the products, services or businesses.

Definitions:

- "Data" means a representation of information, facts, concepts, opinions or instructions in a manner suitable for communication, interpretation or processing by human beings or by automated means;
- “Personal data” means any data about an individual who is identifiable by or in relation to such data;
- “Processing” in relation to personal data, means a wholly or partly automated operation or set of operations performed on digital personal data, and includes operations such as collection, recording, organising, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction;
- **Data fiduciary:** The person or entity that decides how to process personal data.
- **Data processor:** The person who processes personal data on behalf of the data fiduciary.
- **Data principal:** The individual whose personal data is being processed.

Collection of Information:

Nubra may collect Personal Information, Transaction Information, and Non-Personal Information (as defined below) when you register an account or create an account on our Platform or when you use our Services. However, certain areas of the Platform may be accessed without requiring you to create an account or register as a member. Information includes Data from credit information companies/credit reference agencies, risk management and fraud prevention agencies, and national and government databases.

- We collect and verify location, IP address, and device details (e.g., device type, operating system, IMEI) to confirm residency and meet regulatory requirements. Information, including browser data and unique identifiers, is securely stored, with passwords/PINs encrypted for protection.
- To utilise features on platforms/ apps by granting us access to Data
- For system development, planning, audit, and administrative purposes, as well as to personalise and enhance the user experience on the platform or app.

Information for Processing of Personal Data:

- Nubra may collect information such as full name, mobile number, email address, password, date of birth, gender, Permanent Account Number (PAN), signature, marital status, nominee details, residential/current address, any national identifiers such as identity card/passport details/Aadhaar card details/Voter ID/driving license, bank account details or any other personal information as required by the law or for providing you various services.

- Conversations during meetings/calls/correspondences/discussions with staff.
- Records of correspondence and other communications with you, including email, telephone conversations, live chat, instant messages and social media communications containing information concerning your grievances, complaints and disputes.
- Any other information, data, or records which you may consent to be collected or used.

Use of Your Information

Nubra may use users' Personal Information for the following purposes:

- To identify users, create login credentials, and facilitate access to the platform.
- To enhance user experience, troubleshoot issues, and conduct platform maintenance.
- To deliver and improve requested services and tailor user experience.
- To protect data and company assets from security threats, unauthorised access, or data misuse.
- To support marketing communications and related activities.
- To enforce terms and conditions and communicate policy updates.
- To process service requests and respond to user inquiries.
- To notify users of important updates, platform changes, and policy information.
- To ensure compliance with applicable laws and regulatory requirements.
- To provide or refer to the various other products of Nubra and its associate company.

Processing Personal Information

The following are obligations of Nubra for data processing

- Nubra may process user Personal Information to fulfil a contract, support legitimate interests (like platform use and login generation), meet legal obligations, and with user consent when needed.
- Nubra may process data for offering the products and to manage relations.
- To contact you and enhance user experience.
- Nubra may analyse and process user preferences, account activities, and service usage patterns to identify potential areas of interest in its array of financial products and services.
- While ensuring compliance with applicable laws and regulations, Nubra may leverage such insights to communicate opportunities, promotions, or additional products that may enhance the user's experience.

Data recipients with whom we disclose User Personal Information

Nubra may be required to share user Personal Information with

1. Business Partners;
2. Service Providers, Vendors, agents;
3. Third-party Agents
4. Auditors;

We may share your Data, without obtaining your consent or without intimating you: (a) with governmental, statutory, regulatory, executive, law-enforcement, investigating or judicial/ quasi-judicial authorities, departments, instrumentalities, agencies, institutions, boards, commissions, courts, tribunals, who ask for such Data including by way of an order, direction, etc; or (b) with any person, where disclosure is necessary for compliance of any legal or regulatory obligation. Wherever the Data is shared as above, we will not have control over how such Data is further processed by such authorities, persons, etc.

Facilitating International Data Transfers

Nubra may engage the services of a Cloud Service Provider (CSP), whose data servers might be located outside India. In such cases, there is a possibility that Personally Identifiable Information (PII) could be stored beyond Indian territorial boundaries. This will, however, be in compliance with applicable regulations and prevailing laws.

If it becomes necessary or incidental to transfer data outside a user's country or region of residence, Nubra will take reasonable and appropriate measures to ensure that such transfers are conducted in compliance with applicable laws and regulations, safeguarding the data throughout the process.

Additionally, Nubra may disclose Personal Information to law enforcement or regulatory authorities when necessary to comply with legal obligations.

Data retention

We will comply with all applicable data retention regulations as mandated by regulatory authorities including but not limited to the retention of customer data such as personal, financial, and transactional information for the duration required by relevant laws and regulations to meet legal, audit, and operational needs. Once the retention period expires, we will securely delete or anonymise the data in accordance with industry best practices, unless extended retention is necessary for legitimate business purposes or to fulfill legal obligations.

User Rights

1. Users acknowledge that Nubra has the right to use and process their data in accordance with the consent provided by the user. No action can be taken against Nubra for data transfer or processing conducted within the scope of the user's consent. These rights may include, but are not limited to, the rights to information, access, rectification, erasure, objection, restriction of processing, right to nominate and the right to file a complaint. If the processing of Personal Information is based on the user's consent, the user retains the right to withdraw this consent at any time subject fulfillment of the requirements. It is important to note that the withdrawal of consent will not affect the legality of any data processing conducted prior to the withdrawal. Nubra will ensure that any further processing of Personal Information ceases immediately upon the withdrawal of consent, except where otherwise permitted or required by law.
2. By providing this consent, users empower Nubra to process their data in a transparent and lawful manner, while retaining full control over their rights as data subjects. Nubra remains committed to respecting and protecting these rights in compliance with applicable data protection laws.
3. **Exercising rights:** To exercise user rights, Nubra may need to request specific information from users to verify their identity and confirm their entitlement to those rights. User can exercise their rights by contacting Nubra at "privacy@zanskarsec.com".

Consent Withdrawal

To withdraw consent for processing your personal data, please email privacy@zanskarsec.com from your registered email ID. The request will be processed within 30 business days. Note: Some data may be retained for legal purposes, and withdrawal may affect services provided.

Data Security

At Nubra, we seamlessly integrate Governance, Process, and Technology, demonstrating our commitment to our customers and stakeholders. We implement appropriate security measures, including administrative, physical, and technical controls, to protect your Personal Information.

How to contact us

If you have any questions about our privacy practices or this privacy statement, or if you would like to request this statement in a different format, please reach out to us at: privacy@zanskarsec.com

Grievance Redressal

In case of any queries or grievances related to privacy please contact us at - privacy@zanskarsec.com. The DPO appointed will be the Grievance Officer and can be contacted at privacy@zanskarsec.com

Governing Law & Jurisdiction

This policy will be governed by and construed in accordance with the laws of India and subjected to the exclusive jurisdiction of the Courts of Bangalore.

Changes to Our Privacy Statement

Nubra may update its data privacy practices and revise this privacy statement as needed, with the updated version posted on our website. Nonetheless, our commitment to safeguarding the privacy of website users will remain steadfast.