

## Privacy Policy

For the 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 clients and the term "We", "Us", "Our" shall mean Turtle Wealth Management Pvt. Ltd.

We, at Turtle Wealth, acknowledge and accept that the personal details that you impart to us, is to be kept in strict confidentiality and to use the information only in the manner which would be beneficial to our customers. We consider our relationship with you as invaluable and strive to respect and safeguard your right to privacy. We shall protect the personal details received from you with the same degree of care, but no less than a reasonable degree of care, to prevent the unauthorized use, dissemination, or publication of these information as we protect our own confidential information of a like nature. We shall use the personal information to improve our service to you and to keep you updated about our new product or information that may be of interest to you. The information collected from you would be used in the right spirit and context in which it is intended to be used. Your information would be used by us to process your trading request and to carry out the settlements of your obligations.

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 (as defined under the Information Technology Act, 2000), if any, on computers that may be protected by physical as well as reasonable technological security measures and procedures in accordance with Information Technology Act 2000 and Rules thereunder. 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.

### **Collection Of Sensitive Personal Data Or Information:**

Turtle wealth may for the 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;
- PAN, KYC Status, Signature and Photograph;
- Bank account or other payment instrument details; or any other detail for providing services.

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), custodian etc. solely for the purpose of processing your transaction requests or serving you better and meeting compliance.

Under certain circumstances we may be required to share the information given by you with the third parties, where we feel they can contribute to add value and improve the quality of services imparted by us to you. We shall take all reasonable steps to ensure that the confidentiality of your information is maintained by imposing strict confidentiality standards on all the third parties with whom we part these information. In all circumstances we shall ensure that your personal information is protected by strict confidentiality agreement. We shall not allow any third parties to retain your personal information longer than what is warranted by the nature of services rendered. We would also impart your personal information wherever it is required to be disclosed under law to any of the governmental agency or regulatory bodies. By agreeing to avail the service offered by Turtle Wealth you have agreed to the collection and use of your Sensitive Personal Data or Information by Turtle Wealth. You always have the right to refuse or withdraw your consent to share/dissemination of your Sensitive Personal Data or Information by contacting our team. However, in such an event, you would no longer avail the services of Turtle wealth

## **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.

## **Cookies and Tracking Technology:**

A cookie is a small data file that certain Web sites write to your hard drive when you visit them. Cookies cannot be used to run programs or deliver viruses to your computer. A cookie file can contain information such as a user ID that the site uses to track the pages you've visited, but the only personal information a cookie can contain is information you supply yourself. A cookie can't read data off your hard disk or read cookie files created by other sites. Cookies save your time, for example, if you personalize a web page, or navigate within a Site; a cookie recalls your specific information on subsequent visit [www.turtlewealth.in](http://www.turtlewealth.in) also uses cookies to track user traffic patterns. We do this in order to determine the usefulness of our website information to our users and to see how effective our navigational structure is in helping users reach that information. You may accept or decline cookies. Most web browsers automatically accept cookies; however you can modify your browser setting to decline cookies. In addition to cookies, our site uses a variety of technical methods for tracking purposes, which may include web beacons. Web beacons are small pieces of data that are embedded in images on the pages of web sites [www.turtlewealth.in](http://www.turtlewealth.in) also uses these technical methods to analyze the traffic patterns on our web site, such as the frequency with which our users visit various parts of our web site.

## **Updating Or Reviewing Your Sensitive Personal Data Or Information:**

You may upon written request to us review the sensitive personal data or information provided. Team Turtle 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:**

Turtle wealth uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information. We cannot, however, ensure or warrant the security of any information you transmit to Turtle Wealth and you do so at your own risk. Once we receive your transmission of information, Turtle Wealth 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.

## **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. Although we choose our business partners carefully, Turtle Wealth is not responsible for the privacy practices of web sites operated by third parties that are linked to our site. Once you have left our website, you should check the applicable privacy policy of the third party website to determine how they will handle any information they collect from you

### **Disclaimer as to Loss:**

Although, we take appropriate steps to maintain the security of Personal Information we collect from you. But you must understand that the open nature of the Internet is such that data may flow over networks without security measures and may be accessed and used by people other than those for whom the data is intended. Turtle Wealth Management Pvt Limited assumes no responsibility of whatsoever nature as to make good the losses and damages you may incur, due to privacy and/or security breach of your Personal Information.

### **Changes To Our Privacy Policy:**

Please note that this policy may change from time to time. If Turtle Wealth change its privacy policies and procedures, it will post those changes on Turtle Wealth website to keep you/users aware of what information Turtle Wealth collect, how it uses it and under what circumstances 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.