

CHETNA WEALTH PRIVATE LIMITED - PRIVACY POLICY

Introduction and Scope

Last Updated: October 2025

This Privacy Policy outlines the procedures by which Chetna Wealth Private Limited (“CW” or “the Company”), a Private Limited Company (CIN: U70200AP2025PTC121751), collects, utilizes, safeguards, and discloses your **Personal Data** and **Non-Public Personal Information (NPI)** when you subscribe to or use our investment advisory and algorithmic trading services. By engaging with our services, you consent to the practices described in this policy.

1. Collection of Personal Data

We strictly limit the collection of Personal Data and NPI to what is necessary for service delivery, contractual fulfillment, and adherence to Indian regulatory obligations, including Know Your Customer (KYC) and Anti-Money Laundering (AML) norms.

1.1. Data Collected by Category

Data Category	Examples of Information Collected	Purpose and Legal Basis
Identity Data (KYC/NPI)	Full Name, PAN, Aadhaar Number, Date of Birth, Physical Address, Scanned Proof of Identity/Address, and Registered Bank Account Details.	Legal Compliance and Contractual Necessity: Onboarding, mandated regulatory verification (KYC/AML), and processing lawful refunds/payouts.
Financial Profile	Income Range, Net Worth, Risk Tolerance Questionnaire results, Investment Goals, and Existing Portfolio Holdings.	Service Provision and Suitability: Tailoring bespoke investment advice, ensuring investment suitability, and calculating Assets Under Advice (AUA).
Transaction	Records of trades executed by you	Contractual Fulfillment: Portfolio

Data	(Non-Discretionary) or executed on your behalf (Algorithmic Services), investment amounts, dates, and account balances.	monitoring, performance attribution tracking, and calculating returns/ deducting authorized fees.
Technical & Usage Data	Internet Protocol (IP) address, operating system, browser type, device information, and activity logs on our website.	Legitimate Interest: Website security, technical troubleshooting, and improving service infrastructure.

1.2. Methods of Data Collection

Data is collected through the following mechanisms:

1.
Directly from the Client: Information provided during the account opening process, service applications, communication via email, and submission of financial documents.
2.
Automatically via Technology: Data collected through the use of cookies, web beacons, and server logs when you access or interact with our website or digital platforms.

2. Utilization of Collected Data

We use your Personal Data solely for the following explicitly defined purposes:

Purpose	Description of Use
Service Provision	To manage your account, deliver investment advice, process your algorithmic trading capital, and monitor performance as per the service agreement.
Regulatory	To satisfy statutory obligations including KYC, AML checks, fraud

Compliance	prevention, and timely submission of information to tax authorities (e.g., TDS deductions).
Client Communication	To send service updates, transaction confirmations, policy change notifications, and responses to your support inquiries.
Service Improvement	To analyze user interactions, improve the functionality of our website and trading algorithms, and develop new services.

3. Data Security, Retention, and Disclosure Policy

3.1. Security and Retention Commitment

SECURITY COMMITMENT: Client NPI is secured using industry-standard **physical, technical, and administrative safeguards**. These include advanced encryption protocols for data transmission, robust access controls (Need-to-Know basis), and dedicated firewall technologies to prevent unauthorized access.

Retention: Data is retained only for the period necessary to fulfill the services and satisfy **mandatory legal and regulatory record-keeping requirements** under Indian laws, even after the cessation of service.

3.2. Disclosure Policy

NO SALE OF DATA: CW shall **never sell, rent, or trade Client NPI** to unauthorized third parties for direct marketing or commercial profit.

Disclosure of personal data is strictly limited to necessary and legally mandated circumstances:

1. **Authorized Service Providers:** Third parties (e.g., payment processors, auditors, legal advisors) assisting in core service delivery, provided they are bound by equally **strict confidentiality agreements**.
- 2.

Legal Requirements: Disclosure is made when compelled by law, such as in response to a court order, a subpoena, or a mandatory request from a regulatory body (e.g., SEBI, RBI, Income Tax Department, Police).

3.

Corporate Events: In the event of a merger, acquisition, or sale of assets, NPI may be disclosed to the successor entity, provided they agree to adhere to this Privacy Policy.

4. Cookies and Tracking Technologies

4.1. Website Usage and Cookie Types

Our website uses **cookies and tracking technologies** to enhance user experience, analyze site traffic, and maintain operational security.

- **Strictly Necessary Cookies:** Essential for website function, secure sign-in, and maintaining security features.
- **Performance/Analytics Cookies:** Used to track anonymous data about website visits (e.g., pages viewed, duration of visit) to improve site performance and user experience.
- **Consent and Control:** By accessing and using our site, you consent to the use of cookies. Users retain the right to manage cookie preferences through their individual browser settings, though disabling strictly necessary cookies may impact website functionality.
- **Data Sharing:** No Personal Data collected via cookies is shared with third parties beyond service providers essential for website operation and regulatory authorities as required by law.

5. Policy Updates and Grievance Redressal

5.1. Changes to the Policy

Area	Details
Modification Rights	CW reserves the right to modify, amend, or update this Privacy Policy at any time and at its sole discretion.
Communication	All substantive changes will be communicated via prominent notice on our website and/or direct communication to registered clients.
Acceptance	Continued use of our services after the effective date of such changes implies express acceptance of the updated policy.

5.2. Data Grievance Contact

For any questions, concerns, or grievances related to the handling and protection of your Personal Data, please contact our dedicated support team:

Area	Details
Grievance Contact Email	chetnawealth@gmail.com
Operational Hours	Monday to Friday, 10:00 AM – 6:00 PM IST.
Response Time	We strive to acknowledge all data-related inquiries and provide a resolution plan within 3-5 business days .

Brand Identity Placeholder

