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# Data Privacy Notice

## **INTRODUCTION**

Emirates NBD Capital India Private Limited (“**EMCAP India**”) is registered at A/1204, G Block, C 70, The Capital, Bandra Kurla Complex, Bandra (East), Mumbai, Maharashtra, 400051.

This Data Privacy Notice, herein referred to as the "Notice", describes the types of Personal Data EMCAP India collects, how this data is used, stored and shared, and your choices regarding this data. EMCAP India is the Data Fiduciary for the Personal Data collected in connection with the use of EMCAP India Services.

## **SCOPE**

This Notice applies to all Customers of EMCAP India, including Customers of EMCAP India’s website, for investment banking and capital markets services, including equity capital markets (**ECM**), debt capital markets (**DCM**), related merchant banking and advisory offerings provided, and any other investment banking services (collectively, the “Services”) and through other interactions and communications you may have with us. This Notice specifically applies to:

- Consumers/Customers; and
- Personal Data collected/received by EMCAP India through and in connection with the various Services provided.

EMCAP India is committed to providing you with exceptional banking Services and wants you to have confidence in the way EMCAP India uses your Personal Data. EMCAP India is committed to protecting your privacy and your Personal Data.

Further this Notice explains the various measures EMCAP India have in place to protect the security of your Personal Data and minimise the potential for its unauthorised use, disclosure, and destruction.

## **YOUR DATA PRIVACY JOURNEY WITH US**

In certain instances of Processing as set out below, EMCAP India may act as a "Data Fiduciary" or a "Data Processor" in relation to your Personal Data.

**Who is a Data Fiduciary?** EMCAP India will act as a Data Fiduciary when processing your Personal Data. A Data Fiduciary is an entity who solely, or jointly with others, determines the purposes ("why") and means ("how") of Personal Data Processing. In most cases, EMCAP India will act as the Data Fiduciary when Processing your Personal Data – this means EMCAP India will decide on how to collect, Process, and use Personal Data in this role.

**Who is a Data Processor?** In some other cases, EMCAP India will act as a Data Processor when Processing your Personal Data on behalf of another Emirates NBD Group Entity (**ENBD Group Entity**). In these cases, EMCAP India will perform the Processing of the Personal Data under specific instructions from the ENBD Group Entity acting as the Data Fiduciary.

If you have any questions about how EMCAP India uses your Personal Data, you can contact us by using the "**Contact Us**" information at the end of this Notice.

## **CONFIDENTIALITY OF PERSONAL DATA**

When EMCAP India collects your Personal Data, EMCAP India provides a safe, secure, and confidential environment in all our delivery channels to ensure that your Personal Data remains private and used for the purposes for which it is obtained and held.

EMCAP India has a legal obligation to keep your data confidential, however, EMCAP India may disclose your data to a third party where:

- EMCAP India is legally obliged to do so. In circumstances where the disclosure of your data is imposed by a legal and/or regulatory Authority, including but not limited to courts.
- In circumstances where the disclosure is made with your express consent or through a representative nominated by you.

## **UNDERSTANDING PERSONAL DATA AND PROCESSING**

Personal Data and Processing have specific meanings under Applicable Laws. It is important that you understand these terms.

### **What is Personal Data?**

Personal Data as per the Applicable Laws means, any data which relates to an individual who can be identified directly or indirectly from that data. The definition includes a wide range of personal identifiers that constitute Personal Data, including but not limited to:

- Identification information (e.g., name, date of birth, government-issued ID\*\*)  
  
\*\*You may also choose to provide your Aadhaar information for identification purposes or to fulfil statutory requirements applicable to us for the purpose of providing you benefits (where applicable). Please note that it is not mandatory for you to provide your Aadhaar information for identification purposes, and you may provide other identification documents such as PAN card, passport or driving license.
- Contact information (e.g., address, email address, phone number)
- Financial information (e.g., account numbers, transaction history, credit score reports)
- Employment information (e.g., occupation, employer)
- Demographic information (e.g., gender, marital status)

### **What is Processing?**

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, organisation, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.

## **PERSONAL DATA EMCAP INDIA COLLECTS ABOUT YOU**

### **Personal Data that you provide to us**

EMCAP India collects Personal Data directly from you as our Customer or prospective Customer. EMCAP India collects information you provide directly to us through your access or use of EMCAP India's products and Services. For example, when you apply for a product or Service on our website(s), by telephone, email, or when you enter an EMCAP India premises and provide Personal Data with one of EMCAP India's employees.

### **Personal data EMCAP India collects about you from other sources**

EMCAP India may collect Personal Data about you from other sources such as, but not limited to the following:

- Representative(s) of a corporate client.
- Legal representatives (power of attorney) of a Customer.
- People appointed to act on your behalf.
- Joint account holder.
- Other Emirates NBD Group entities, including their branches, subsidiaries, etc.
- Banks and other financial institutions.
- Government authorized Credit Information Agencies.
- Digital identity solutions.
- Government databases.
- Law enforcement officials.

- Regulatory bodies such as SEBI, etc.
- Beneficiaries of your payment transactions.
- Nominated contact person by an existing account holder.
- Third party providers and partners to help us improve the Personal Data EMCAP India holds and to provide more relevant and interesting products and Services to you.
- Reference contacts provided in the application form by you.
- Publicly available sources.

**Personal data EMCAP India may collect about other individuals**

In certain circumstances, EMCAP India may be provided Personal Data by you about individuals who do not have a direct relationship with us. Further, to the extent, Personal Data is provided to EMCAP India by third party sources, EMCAP India would be responsible for ensuring that Consent is obtained from such individuals in order to process their Personal Data. This may happen, for instance, when you provide us with Personal Data about:

- Beneficiaries of your payment transactions.
- Persons authorised to act on behalf of a Customer.
- Authorised signatories and representatives of Customers.
- Professional advisors associated with a client (e.g., legal counsel, auditors, consultants, and other intermediaries)
- Legal representatives (power of attorney) of a Customer.
- Shareholder(s)/director(s) of a corporate Customer.
- Spouses and immediate Relatives.

- Successors and right holders.
- Reference contacts requested at the time of availing Services from EMCAP India.
- Contact persons details.

### Use of your personal data

Personal Data includes information that EMCAP India collects and processes about you depending on the products or Services you obtain or receive.

Below is a list which highlights examples of categories of Personal Data EMCAP India collects about you:

Category of Personal Data	Purpose
<b>Account Management Details</b> (e.g., sign-in credentials, account details, product/service requests such as debit/credit cards and personal finance)	To enable EMCAP India to Process your data for the sole purpose of administering your relationship with EMCAP India.
<b>Website/App Usage &amp; Analytics Data</b> (e.g., app performance metrics, usage gestures, interaction history, connections and interests)	To see how many Customers are using a particular gesture, to monitor app health, to diagnose and fix bugs or crashes, or to make future performance improvements
<b>Developer Communications Data</b> (e.g., push notification contact details)	Sending a push notification to inform Customers about an important security update.
<b>General Correspondence Data</b> (e.g., information filled in forms, records of communication via phone, email, online, or face-to-face)	To contact you if you have asked us to do so including to resolve troubleshooting problems and helping with any issues concerning EMCAP India website or apps.
<b>Contact Details</b> (e.g., name, job title, postal address)	To contact you in relation to your queries or requests, facilitate

(including home address where provided), business address, telephone number, mobile number, fax number, and email address)	onboarding and service delivery, communicate important updates, and maintain records of correspondence.
<b>Identity and KYC Data</b> (e.g., date of birth, nationality, country of birth, country of residence, employment status, tax identification number (such as PAN, Aadhar, etc), and other details required for KYC/ anti money laundering ( <b>AML</b> ) checks)	To verify your identity, conduct KYC and AML checks, comply with applicable legal and regulatory requirements, and assess your eligibility for products and services.
<b>Marketing, Promotional &amp; Commercial Data</b> (e.g., contact details for emails/SMS, contract history for similar goods/services, market research data)	EMCAP India sends Customers a promotional email or SMS relating to a product or Service on offer.
<b>Survey &amp; Feedback Data</b> (e.g., customer opinions, satisfaction survey responses)	Sending Customer satisfaction surveys.
<b>Video Protection Data</b> (e.g., CCTV footage at premises and ATMs)	For security purposes at EMCAP India premises, and to monitor and investigate reported issues from Customers.
<b>Technical and Usage Data</b> (e.g., IP address, browser type, device information, and other browser-generated data when you visit our website)	To operate and maintain our website, monitor usage and performance, enhance user experience, and ensure security, including detecting and preventing fraud or misuse.
<b>Third-Party and Regulatory Data</b> (e.g., data obtained from regulatory agencies, and analytics providers)	To verify your identity and records with authorised agencies, comply with regulatory requirements, and analyse website usage and performance to improve our services.

## Disclosure of your Personal Data by us

EMCAP India only discloses your Personal Data outside of EMCAP India in limited circumstances. If EMCAP India does share the Personal Data outside of EMCAP India, we will put in place appropriate controls and data sharing agreements that require recipients to protect your Personal Data, unless EMCAP India is legally required to share that Personal Data. All contractors or recipients that work for EMCAP India will be contractually obligated to comply with EMCAP India's instructions. EMCAP India does not sell your Personal Data to third parties.

EMCAP India may disclose your Personal Data to third-party Service providers, agents, and subcontractors (Suppliers) for the purposes of providing Services to us or directly to you on EMCAP India's behalf within and outside India.

EMCAP India takes steps to ensure that any third-party service providers who handle your Personal Data comply with Applicable Laws and protect your Personal Data to the same extent that EMCAP India does. EMCAP India will aim to anonymise your Personal Data or use aggregated non-specific data sets where possible.

All sharing of Personal Data with third parties shall be based on the Consent received from you, unless required to do so, to comply with the Applicable Laws and other legal and regulatory requirements. Find below the supporting Schedule with a list of categories of third parties with whom EMCAP India may share your data.

<b>Category of Third Party</b>	<b>Description of Service Provided</b>
Account Holders	EMCAP India may share your Personal Data with any joint account holders, guarantors, trustees, or beneficiaries assigned by you at the onset or during the course of receiving EMCAP India products/Services.

Affiliates	EMCAP India may share your Personal Data with companies within the Emirates NBD Group who may support us in any of the purposes set out in this Notice to (1) improve and enhance the Customer experience and (2) to administer your account with EMCAP India.
Analytics Providers	EMCAP India may share your Personal Data with analytics providers that assist us in the optimisation of EMCAP India website and apps including by measuring the performance of EMCAP India line campaigns and analysing visitor activity.
Asset Purchasers	EMCAP India may share your Personal Data with any third party that purchases, or to which EMCAP India transfers, all or substantially all of EMCAP India assets and business. Should such a sale or transfer occur, EMCAP India will engage best efforts to try to ensure that the entity to which Emirates NBD ( <b>ENBD</b> ) transfers your Personal Data uses it in a manner that is consistent with this Notice.
Business Partners	Business partners may also include any entity (including its professional advisors and authorised representatives), who provide funding to EMCAP India or members of the ENBD Group, any entity that provides us with debt or equity finance and any potential purchasers of any part of our business. Business partners may also include any party to a transaction acquiring an interest in, or assuming risk in, or in connection with your banking relationship with EMCAP India.
Courts, Regulators, and Government Authorities Courts, Regulators, and Government Authorities	EMCAP India may share your Personal Data with these parties where EMCAP India believes this is necessary to comply with a legal or regulatory obligation, or otherwise to protect EMCAP India's rights or the rights of any third party. To investigate or address claims or disputes relating to the use of EMCAP India's Services, to

	satisfy requirements under Applicable Laws, regulations, or operating licences or agreements, or pursuant to legal process or governmental request, including from law enforcement. To perform the role of collaborators, where Services require their involvement.
Credit Information Agencies	EMCAP India may share your Personal Data with government-authorized Credit Information Agencies and fraud prevention agencies to comply with EMCAP India's legal and regulatory obligations.
Insurance Providers	EMCAP India may share your Personal Data with insurance providers, including underwriters, brokers, and associated parties.
IT Service Providers	System based processing of personal details as part of organisational/ operational requirements. E.g. cloud hosting services; application development and support services; information technology infrastructure services; email services; communication services providers, call recording services. Help maintain the safety, security, and integrity of EMCAP India Services and Customers. Usage of artificial intelligence productivity tools to enhance performance of Services.
Law Enforcement Agencies & Authorities	To assist law enforcement agencies for the purposes of preventing, detecting, investigating, or prosecuting criminal offences.
Legal/Profession Advisors	The provision of business consulting, audit and legal services including access to and analysis of Personal Data as part of business initiatives, statutory audits, legal claims, and ad-hoc

	consultancy advice.
Representatives / Legal Guardians	EMCAP India may share your Personal Data with anyone who provides instructions or operates any of your accounts on your behalf including advisers (such as solicitors and accountants), intermediaries and those under power of attorney or letter of authorisation.
Other Third Parties	<p>Provide, maintain, and improve EMCAP India Services, including, for example, to facilitate payments, send receipts, provide products and Services you request (and send related information), develop new features, provide user support to Customer(s), develop safety features, authenticate Customer(s), and send product updates and administrative messages.</p> <p>Perform internal administration and operations, including, for example, to prevent fraud and abuse of EMCAP India Services; to troubleshoot software bugs and operational problems; to conduct data analysis, testing, and research; and to monitor and analyse usage and activity trends.</p> <p>Send you communications EMCAP India think will be of interest to you, including information about products, Services, promotions, news, and events of EMCAP India, where permissible and according to local Applicable Laws.</p> <p>Notify you about changes to EMCAP India's terms, Services or policies and other communications that aren't for the purpose of marketing the Services or products of EMCAP India and its partners.</p>

## **Automated processing/s**

The way EMCAP India analyses Personal Data relating to EMCAP India Services may involve Profiling or other automated methods to make decisions about you that relate to the following:

- AML, combatting the financing of terrorism, sanctions checks, KYC validations (including through national identity systems) and screening 'politically exposed' people.
- Assessments required by regulators and appropriate authorities – certain details in your information may suggest that you are likely to become financially vulnerable and EMCAP India may need to help you.
- Credit and affordability checks (including credit limits) – EMCAP India will consider several factors including information about your income, expenses and how well you have kept up on payments in the past.
- Monitoring your account for fraud and other financial crime – **EMCAP India will assess your transactions to identify any that are unusual.**

You have a right to certain information about how EMCAP India make these decisions. You may also have a right to request human intervention in case it pertains to a fully automated process and to challenge the decision. Refer the “How to Contact Us” section for further details on reaching out to us with your request.

## **Is it mandatory or optional for me to provide my personal data?**

EMCAP India needs your Personal Data to provide you with the Services or products requested by you. EMCAP India also needs to capture express Consent to be able to process the Personal Data for fulfilling EMCAP India's contractual and legal obligations.

If you do not provide us with the requested Personal Data and the Consent to process your Personal Data, EMCAP India may have to

decline your request for our product(s) and/or Service(s), or if EMCAP India is already providing you with the product(s) and Service(s), EMCAP India may need to suspend or stop providing you with the product(s) or Service(s), which can lead to closure of your banking relationship with us, subject to compliance with EMCAP India's legal obligations to retain data.

## **Cookies**

EMCAP India collects Personal Data about your internet activity using technology known as cookies, which can often be controlled through internet browsers and by using EMCAP India cookie preference centre on the EMCAP India website and app. These include but are not limited to:

- **Technical information**, such as your IP address and device ID.
- **Information about your visit**, such as your URL and website interaction.
- **Location data**, with your approval, used to show you the location of the nearest branch or ATM based on your IP address, coordinates or a unique device code.

## **International Data Transfers/s**

EMCAP India is a subsidiary of Emirates NBD, a global organisation, and your Personal Data may be stored or processed in any country where EMCAP India has facilities or in which EMCAP India engages Service providers and subcontractors. EMCAP India has put in place appropriate safeguards in accordance with applicable legal and data protection requirements to ensure that your data is adequately protected.

## What are your rights?

You have certain rights in respect of your Personal Data, and EMCAP India has processes to enable you to exercise these rights. Your rights are as follows:

- **Opt Out / Unsubscribe:** You can request to be removed from EMCAP India's marketing mailing list, through the unsubscribe button in the email itself. We have other channels to request removal as well, such as visiting the EMCAP India's mobile application settings, calling the customer care centre and sending a SMS to the designated number communicated to you as part of the marketing content.
- **Right to Access** (also known as a '**Subject Access Request**'): You have the right to obtain details and confirmation on how and why EMCAP India processes your Personal Data and receive a copy of your Personal Data held by us, where technically feasible.
- **Right to Rectification:** You have the right to request for your Personal Data to be amended or rectified where it is inaccurate (for example, if you change your address or mobile number) and to have incomplete Personal Data completed.
- **Right to Erasure (also known as 'the Right to be Forgotten')**: You have the right to deletion of your Personal Data under certain circumstances.
- **Right to Object and/or Restrict:** You have the right to object and/or restrict to our processing of your Personal Data in certain situations, in line with the Applicable Laws and regulations, such as when the accuracy of your Personal Data Processed is contested, EMCAP India shall restrict the Processing, based upon your request, until the accuracy is restored.
- **Right to Withdraw Consent:** Where EMCAP India Processes Personal Data based on Consent, in line with the Applicable Laws and regulations, individuals have a right to withdraw their Consent at any time. Additionally, individuals have the right to withdraw their Consent at any time where Consent was the only basis of Processing, and such Personal Data Processing is not essential for EMCAP India to be able to provide the access to products and Services requested.
- **Right to Nominate:** You have the right to nominate one or more individuals to exercise your rights under this Notice in case of your death or incapacity (i.e., inability to exercise statutory rights granted to a Data Principal due to unsoundness of mind or infirmity of the body).

- **Right of Grievance Redressal:** You can address any grievances in relation to this Notice as per the procedure set out in the “How to contact us” section below.

Please note, all rights are subject to qualifications and limitations. In other words, there may be instances and justifiable grounds to deny any request where EMCAP India is required or permitted by law or technical infeasibility to do so. EMCAP India will always be clear and communicate this to you if these instances arise.

Also note, for the purpose of upholding the security, confidentiality, and integrity of your Personal Data, EMCAP India may verify your identity before allowing you to access your Personal Data.

## **Security**

The Security of your Personal Data is important to us. We make every effort to ensure that your Personal Data is secure in our environment. EMCAP India maintains physical, technical and organizational safeguards to secure your Personal Data from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss. Moreover, access to your Personal Data is limited to those employees, agents, contractors, other third parties, etc. who have a responsibility towards your Personal Data and only on a need-to-know basis. The organization will only process your Personal Data on EMCAP India’s instructions and they are subject to a duty of confidentiality.

Additional safeguards that EMCAP India uses to safeguard your Personal Data include:

- Applying physical, digital and procedural safeguards in connection with the collection, storage and disclosure of Personal Data;
- Protecting the security of your Personal Data during transmission by using Encryption technology;
- Utilizing information security best practices along with safeguards (such as firewalls, antivirus, etc.) to keep the Personal Data secure.
- Conducting technical assessments (e.g. vulnerability assessments, penetration testing, etc.) and network monitoring, to assess the security posture of the organization’s environment and remediate vulnerabilities.

EMCAP India evaluates these measures on a periodic basis to ensure the security of the Processing.

Moreover, the EMCAP Group is aligned to National Institute of Standards and Technology Cybersecurity Framework (NIST CSF), the gold standard of information security, that enables the Group to assess and improve our ability to prevent, detect, and respond to cybersecurity risks. The NIST CSF covers across domains related to information security such as strategy, governance, security architecture, threat intelligence & vulnerability management, identity & access management, information & privacy protection, incident & crisis management, risk & compliance management.

Your EMCAP India profile is password-protected so that only you and authorized EMCAP India employees have access to your account information. While we at EMCAP India will do our best to ensure the security and protection of your Personal Data, the security of your Personal Data will depend in part on the security of the device that you use to communicate with us and the security measures you use to protect your personal information, user ID and passwords.

To ensure that your Personal Data is always kept safe, we urge you to take appropriate measures to protect your personal information, user ID and passwords and any other information that is necessary to use our channels.

If you have any further questions on this issue, refer to the Terms & Conditions – [https://www.emiratesnbdcapital.co.in/-/media/enbd/indiacapital/files/terms\\_and\\_conditions.pdf](https://www.emiratesnbdcapital.co.in/-/media/enbd/indiacapital/files/terms_and_conditions.pdf)

Please contact the EMCAP India our grievance team by emailing [emcapindia@EmiratesNBD.com](mailto:emcapindia@EmiratesNBD.com), in case you receive fraudulent emails or require any assistance with regards to our product and services.

### **What happens if there is a Personal Data breach?**

Whilst EMCAP India takes measures to secure your Personal Data, risks to data security do exist, and there is always a possibility of unauthorised use, disclosure, modification and/or destruction of your Personal Data. In the event of a Personal Data Breach, EMCAP India will notify you and the Data Protection Board of India, without delay, about it and its likely consequences, measures taken by us to mitigate the increased risk and avenues available to you to mitigate the risk as a result of the Personal Data Breach.

## External links

The EMCAP India website and apps may, from time to time, contain links to external sites. If you follow a link to any of these websites, please note that these websites have their own data privacy notices. Please check these notices before you submit any Personal Data to these websites. EMCAP India is not responsible for the data privacy notices, content of such sites or any Personal Data collected by such sites.

## How long does EMCAP India store your data for?

EMCAP India will keep your Personal Data for as long as EMCAP India has a relationship with you and for meeting our legal, accounting, or reporting requirements. Once the EMCAP India relationship with you has come to an end, EMCAP India will retain your Personal Data for a period that enables us to:

- Maintain business records for analysis and/or audit purposes.
- Comply with record retention requirements under the Applicable Law.
- Defend or bring any existing or potential legal claims.

EMCAP India will delete/store with limited access and appropriate safeguards your Personal Data when it is no longer required for these purposes.

In some circumstances you can ask us to delete your data. For further information, please see the "**What are your Rights**" section above.

## How to contact us?

If you have questions or concerns regarding the way in which your Personal Data is being used, please contact our grievance team by emailing [emcapindia@EmiratesNBD.com](mailto:emcapindia@EmiratesNBD.com).

EMCAP India is committed to working with you to obtain a fair resolution to any complaint or concern you may have. If, however, you believe that EMCAP India have not been able to assist with your complaint or concern you have the right to make a complaint to the Data

Protection Board.

**Updates to this Notice**

EMCAP India may occasionally update this Notice. EMCAP India encourages Customers to periodically review this Notice for the latest information on the EMCAP India NBD data privacy practices and obtain your Consent as may be required.

**Consent**

By clicking on “I Accept”/ accepting terms of this Notice, you Consent to us processing your Personal Data (including your Aadhaar information) in the manner set out under this Notice.

If you give us Personal Data about others, please make sure that they are aware of how their Personal Data may be used as set out within this Notice and that they have agreed to Processing their Personal Data for such purposes. Where required by us, you shall be required to provide us with proof of Consents obtained from such persons.

<b>Term</b>	<b>Definition</b>
<b>Applicable Law(s)</b>	Means all Applicable Law(s) which are in force at the date on which this Notice is updated in India.
<b>Authority(ies)</b>	Means legal, supervisory, regulatory, governmental, and quasi-governmental bodies including the SEBI, Indian Computer Emergency and Response Team, Data Protection Board of India etc.
<b>Consent</b>	Means the consent by which the Consumer/Customer authorises EMCAP India or third parties to process their Personal Data, provided that such consent is freely given, informed, clear, specific, and unambiguous indication of the Consumer/Customer agreement, by a statement or by a clear affirmative action, to the Processing of their Personal Data.
<b>Consumer(s)/Customer(s)</b>	Means any natural person or sole proprietor who obtains or may prospectively obtain Services and/or products from EMCAP India, with or without charge, to satisfy their personal need or others' needs. A Customer hence includes a prospective Customer.
<b>Credit Information Agency</b>	Any credit information agency established for the purpose of credit reporting requirements.
<b>Data Transfer(s)</b>	Means any movement of data between or within jurisdictions from one party to the other.
<b>Destruction of Personal Data</b>	Means the act or action of ensuring that Personal Data no will no longer exist.
<b>EMCAP India</b>	Means Emirates NBD Capital India Private Limited and any of its subsidiaries, affiliates and authorised agents.

<b>Encryption</b>	Means the process of encoding information stored on a device and can add a further layer of security. It is considered an essential security measure where Personal Data is stored on a portable device or transmitted over a public network.
<b>Know Your Customer or 'KYC'</b>	Means the mandatory identification and verification of the identity of Customers using documents, data or information obtained from reliable and independent sources.
<b>Lawful Basis</b>	Means the justification to which Personal Data is being processed by EMCAP India.
<b>Notice</b>	Notice refers to this document, i.e., the EMCAP India Notice.
<b>Personal Data</b>	Means any information relating to an identified or identifiable natural person.
<b>Personal Data Breach(es)</b>	A breach of information security and Personal Data through unauthorised or unlawful access thereto, including replication, transmission, distribution, exchange, transfer, communication, or Processing in such a manner leading to the disclosure or
<b>Processing</b>	Means a wholly or partly automated operation or set of operations performed on digital personal data, and includes operations such as collection, recording, organisation, structuring, storage, adaptation, retrieval, use, alignment or
<b>Profiling</b>	Means a form of Processing consisting of the use of Personal Data to evaluate certain personal aspects relating to a Consumer/Customer.
<b>SEBI</b>	Means the Securities and Exchange Board of India.
<b>Services</b>	Means all Banking products and services such as account management provided through all EMCAP India channels such as website, for investment banking and capital markets services, including ECM, DCM, related merchant banking and