

Privacy Policy

This privacy policy ("**Policy**") sets forth the reasonable security practices and security procedures adopted by Aditya Birla Sun Life Pension Management Limited ("ABSLPML" or "Company" or "We" or "Us") and shall apply to use and disclosure of sensitive personal data or information and personal information ("**Personal Information**") provided by You (which means and include as a Customer or a User) on the Website with URL: <https://pensionfund.ABSLPML> (hereinafter referred as "Website") or otherwise at the time of client acceptance / registration/application in connection with availing products or services or facilities of ABSLPML.

This privacy policy shall be read in conjunction with the **Terms of Use** (Terms and Conditions) agreed by you while using the website for availing its services.

Data

ABSLPML collects personal data or information about you from a variety of sources, including through:

- Online and electronic interactions including via the websites, mobile applications, text messaging programs or through ABSLPML branded pages or applications on third party social networks
- Offline interactions with ABSLPML, including via direct marketing campaigns, hard copy registration / application forms, competition entries and contacts through ABSLPML consumer services call centres; and
- Your interaction with online targeted content (such as advertisements) that ABSLPML, or service providers on our behalf, provide to you via third party websites or applications.

Consent

ABSLPML shall obtain Your consent in writing (and includes electronic consent) before collecting Personal Information for providing Services. Personal information for purposes of this Policy includes information that identifies you, such as Your name, date of birth, bank account details or credit card or debit card, phone number, fax number or email address etc and include gender, marital status, city of residence. All Personal Information so provided will be on an 'as on' basis and ABSLPML shall not be responsible for the authenticity of the Personal Information supplied by you. Personal Information which is provided or collected from you are solely for the purposes connected with the Terms of Use which has been agreed by you to provide various products or services or facilities by ABSLPML / Facility Provider / Third Party Service Entity.

Services shall includes all provisions of services and facilities and connected activities which are provided in connection with offering of products and services as a customer of ABSLPML.

You have the option not to provide or agree to the collection of Personal Information. If you choose not to agree with the Policy, you will not be entitled to use the Services as per the

Terms of Use. You can also anytime withdraw the consent you provided by writing to us at One Indiabulls Centre, Tower 1, 16th Floor, Jupiter Mills Compound, 841 Senapati Bapat Marg, Elphinstone Road, Mumbai 400 013 or e-mail at email at care.pensionfunds@adityabirlacapital.com or call us on 1-800-270-7000 (Toll Free) between 9 am to 9 pm, Monday to Saturday and making a request for termination of the services agreed as per the Terms of Use. You may contact us on the above given details for any grievances related to the policy.

Purpose

ABSLPML needs this information to operate and provide various products and services. ABSLPML uses, transmits and discloses your Personal Information only as follows:

- to fulfil Your requests for products and services offered and subscribed and accepted by you and to contact you either through ABSLPML or their third party service providers through any channel of communication including but not limited to email, telephone, sms, etc.
- to deliver to you any administrative notices, alerts, advice and communications relevant to Your use of the Service
- to ABSLPML and its authorised agents and other third party services providers in so far as required for joint marketing purposes, for providing information about the services of ABSLPML and / or to offer similar services to provide you with various value added services and information including for authentication purposes to enable linking of desired services.
- to third-party contractors that provide services to ABSLPML and are bound by these same privacy restrictions;
- for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or identification of other criminal activity;
- to conduct check on Your credit information with any of the credit bureau or to conduct a background check either by their employees or through any third party vendor.
- with the abovementioned parties including with any regulatory, statutory or judicial authorities for compliance with any law or regulation in accordance with this privacy policy

All such Personal Information collected shall be retained so long as you are having account/product with ABSLPML or by any of its third party service entities/service provider ("**Third Party Service Entity**") and remain active to avail various services/product or as may be required under the law or as per applicable policy on data retention if any. In case of deactivation / termination of the account / services with ABSLPML, the Personal Information provided may no longer be used for providing the services/facilities and the same may also get removed upon the expiry of the maximum tenure as may be prescribed under the provisions of the law as applicable or the policy on data retention if any. Unless the Personal Information is purged permanently, the Personal Information may remain on the servers and ABSLPML may however use the Personal Information for data analytics purposes and procedures for improving the provisions of services/facilities by them in a non identifiable manner.

Update Personal Information:

ABSLPML / Third Party Service Entity encourages you to update this information as and when there are any changes. You are also entitled to review the information provided and ensure that any Personal Information or sensitive personal data or information found to be inaccurate or deficient be corrected or amended as feasible. However, ABSLPML shall not be responsible for the authenticity of the Personal Information or sensitive personal data or information supplied by you.

Sharing/Transfer/Disclosure of Personal information:

Your Personal information will not be sold or otherwise transferred to unaffiliated third parties unless otherwise stated at the time of collection or without Your approval as the case may be. However, ABSLPML might share, exchange and disclose information to Central Recordkeeping Agency (CRA) or its affiliates and / or group companies, authorised agents or to any third party service provider as required under the law to deliver you products and services in the manner agreed by you as specifically stated under this Privacy Policy supra.

ABSLPML or any Third Party Service Entity treats Your Personal Information or Your use of the Service as private and confidential and does not check, edit, or reveal it to any third parties except where it is expressly agreed where it believes in good faith, such action is necessary to comply with the applicable legal and regulatory processes, or to protect and defend the rights of other users or to enforce the terms of service. ABSLPML or any Third Party Service Entity may disclose Personal Information where it is under legal obligation to do so or where it is mandated under law. ABSLPML or any Third Party Service Entity may transfer Your Personal Information to another Indian or overseas body corporate that ensures the same level of data protection that is adhered to by ABSLPML, if it is necessary for the performance of a lawful contract between ABSLPML or any person on its behalf and you or where you have consented to the data transfer.

Data may be transferred upon change in control or to other ABSLPML but only in accordance with this Policy.

Personal information may be transferred to any group company of ABSLPML at any time or to a third party only as a result of a sale, acquisition, merger, reorganization or other change in control. If ABSLPML is sold, merged or transferred any part of our business, part of the sale may include Your Personal Information.

Unsolicited Information:

Except where specifically agreed by You or it is necessary for operational or regulatory reasons, ABSLPML or any Third Party Service entity will not send you any unsolicited information/communication. However, to help you to take full advantage of the service offerings/facilities/products of ABSLPML, you will have the opportunity to indicate whether you would like to "opt out" of receiving promotional and/or marketing information about other products, services and offerings from ABSLPML and/or any third parties etc. If you do not opt out, ABSLPML may use contact information to send occasional communication

pertaining to the said information. You can nevertheless unsubscribe from receipt of such emails by following instructions therein or by communicating accordingly to ABSLPML.

Retention of Personal Information:

ABSLPML or any Third Party Service Entity shall not retain Personal Information longer than the Purpose for which it is sought is served or is otherwise required under any other law for the time being in force or in accordance to the data retention policy if any. The Personal Information so collected shall be used only for the Purpose for which it is collected and, in the manner, agreed by you. Personal Information however may remain on the servers unless otherwise deleted or purged permanently.

Third Party Services:

ABSLPML or its Third Party Service Entity may sometimes permit third parties to offer subscription and/or registration-based services through its Website. ABSLPML are not responsible for any actions or policies of such third parties and You should check the applicable privacy policy of such party when providing personally identifiable information. Further, ABSLPML will not be responsible if You do not get the benefits announced if any, by the said third parties permitted to offer subscription or services on its site.

Use of Cookies:

ABSLPML / its web sites may use "cookies" (information stored on Your computer/Your Computer Resources which include mobiles phones and also APPs) by your browser at our request). "Cookies" is a term generally used for small text files a web site can use to recognize repeat users, facilitate the user's ongoing access to and use of the site, allow a site to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising, preferences etc. Cookies themselves do not personally identify you, but they do identify Your computer, computer resources and devices connected with computer resources and include Mobile phones. Generally, cookies work by assigning a unique number to the computer that has no meaning outside the assigning site. You are also being made aware that ABSLPML cannot control the use of cookies or the resulting information by advertisers or third parties hosting data on respective ABSLPML website. If You do not want information collected through the use of cookies, you may change the settings in the browsers that allows to deny or accept the cookie feature as per Your discretion and in the manner agreed by you.

Use of APP

In case of use of facilities/products/services through any APP of ABSLPML, additional terms and conditions governing the manner of usage of APP including collection and disclosure of Personal Information shall be applicable and to be read along this Privacy Policy.

Links to Other Sites

Our website(s) has links to other website(s) in the World Wide Web. The privacy policies of these website(s) is not under our control. Once you leave our servers, use of any

information you provide is governed by the privacy policy of the operator of the site you are visiting. It is advisable to read their privacy policies for further information.

Children

This website is not intended for use by children and minors. Parents are requested to ensure that Personal Information is not provided by minors.

Blocking IP Addresses

ABSLPML uses the help of Internet Protocol ("**IP**") addresses to diagnose any problems with its server and to administer its web site including by blocking certain addresses that it feels are inappropriately using its website. IP addresses are used to gather broad demographics information, such as browser types, visitor's country, visiting frequency, operating systems, etc.

Security of Data

ABSLPML could be subject to verification by a third party for its use of SSL encryption technologies and may also audited by third party auditor for security practice as deemed fit.

Change in Privacy Policy

ABSLPML reserves the right to change the Policy at any time. You may note that this Policy itself and any such change of policy will be effective from the date of posting on the site.