

# Privacy Policy

## 1. Background:

Union Asset Management Company Private Limited ("AMC"), a Company incorporated under the Companies Act, 1956, has been appointed as the Investment Manager to the Schemes of Union Mutual Fund ("the Mutual Fund"). Union Trustee Company Private Limited ("the Trustee Company") is the Trustee to the Mutual Fund. Union Bank of India and Dai-ichi Life Holdings, Inc. are the Sponsors of the Mutual Fund.

SEBI circular no. SEBI/HO/IMD/DF2/CIR/P/2019/57 dated April 11, 2019 captioned 'System Audit framework for Mutual Funds / Asset Management Companies (AMCs)' through the Systems Audit Program Checklist provides guidance to AMCs / Mutual Funds to have a defined and documented privacy policy which is approved by the Board of Directors. Further, the circular requires that procedures be defined in line with applicable regulations with respect to: a) Privacy notice, b) Choice and consent, c) Data collection, d) Data use, retention and disposal, e) Access to data, f) Disclosure to third parties, g) Security controls for private data and h) Monitoring and enforcement.

The AMC / the Mutual Fund understands that investor/ clients/ customers (existing or prospective) and website/mobile application visitors (collectively referred to as "Users") are concerned about the privacy of information. The AMC/ the Mutual Fund has established policies and procedures concerning the collection, use and security of the User's information that will help protect their privacy. This Privacy Policy is designed by the AMC in compliance with the aforesaid SEBI Circular and to help the AMC/ the Mutual Fund serve the Users while maintaining strict privacy and security standards.

The AMC recognizes the importance of keeping the information collected about the Users, confidential. That is why the AMC has always taken great care to protect Users' information. Changes to this Privacy Policy may be made occasionally. The AMC recommends that Users read the Policy from time to time to learn of new privacy practices and changes to the Policy.

The AMC/ the Mutual Fund may collect information about the Users from several sources. The Users may provide information as part of the application or enrolment process or the landing pages during online campaigns. Additionally, the AMC/ the Mutual Fund may obtain information about the Users from third parties. The AMC also develops and retains information about Users based on the transactions and experience with the Users. Finally, the AMC/ the Mutual Fund obtains information about the Users through Internet technology, including the AMC's website/mobile application.

## 2. Privacy Notice

This Policy shall be made available on the AMC's website viz. [www.unionmf.com](http://www.unionmf.com) for the information of the Users. The AMC reserves the right to amend/modify any of the sections of this policy at any time and the Users are requested to keep themselves updated for changes by reading the same from time to time.

### **3. Users Choice and Consent**

This Privacy Policy is available on the AMC's website. Users are expected to read and familiarize themselves with this Policy. By choosing to use and by using the AMC's website and its services (for example, when the User visits the AMC's website and reads news or browses through various other portions of the AMC's website or via the registration form), the User agrees to have consented to the AMC's / the Mutual Fund's collection, use and sharing of the User's personal information as described in this policy.

### **4. Security Controls for Private Data**

The AMC adopts reasonable security practices and procedures and will protect the Users' Personal Information by reasonable security safeguards appropriate to the sensitivity of the Personal Information, consistent with generally accepted standards of commercial business practice, which includes, technical, operational, managerial and physical security controls and that are commensurate with the nature of business at all times in order to protect the Users' Personal Information from unauthorized access, or disclosure while it is under the AMC's / the Mutual Fund's control.

The AMC takes appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of the AMC's/ the Mutual Fund's data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where the AMC/ the Mutual Fund stores personal information. Further, the AMC permits only authorized employees who are trained in the proper handling of customer information, to have access to aforesaid information. The employees who violate the privacy and confidentiality promise shall be subjected to disciplinary action. All information gathered by the AMC/ the Mutual Fund is securely stored within the AMC's controlled databases. The databases are stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited. However, as effective as the AMC's security measures are, no security system is impenetrable. If any User knows or has reason to believe that the Users' account credentials have been lost, stolen, altered, or otherwise compromised or in case of any actual or suspected unauthorized use of the Users' account, the User is requested to please contact the AMC/ the Mutual Fund by contacting the AMC's customer support.

The User agrees and understands that when the AMC/ the Mutual Fund uses trusted third parties to act on the AMC's/ the Mutual Fund's behalf for performing certain functions such as processing transactions, issuing account statements, payment gateway services, customer services etc., contractual or other means are used to ensure reasonable security safeguards appropriate to the sensitivity of the Personal Information, consistent with generally accepted standards of commercial business practice. The AMC would ensure to enter into suitable terms with third party service providers in order to protect client confidentiality and follow a non-disclosure or restricted disclosure policy.

Any account statement containing financial information pertaining to the investor, if it is to be sent over the internet to such investor, distributors or any other entity as indicated above will be sent only through a secure means and/or through encrypted electronic mail.

The User may download materials, data etc. displayed on the AMC's website for non-commercial and/or personal use only. The User may not, however, distribute, modify, transmit, reuse, report, or use the contents of the website for public or commercial purposes, including the text, images, audio and video without the AMC's written permission.

The User shall not delete, modify and/or otherwise interfere with copyright or other intellectual property rights displayed on the AMC's website.

## **5. Data Collection**

The AMC either directly or through third party service providers engaged by the AMC (Service Providers) such as the Registrar and Transfer agents collects, receives, possesses, stores, deals or handles information received from investors/client/customers whether existing or prospective. Such information can be personal and sensitive in nature as per the indicative list given below:

- (i) Bank Account details, change of bank account details or registration of multiple bank accounts etc. through application forms;
- (ii) Payment instrument details at the time of submitting application at the time of investment or as proof for carrying out change of bank account or any other details of debit card obtained (if any);
- (iii) Generation and storing password (PIN) in encrypted form based on the request from the investor under the online mode of investments;
- (iv) Biometric information obtained, if any;
- (v) Demat Account details like beneficiary account no. etc;
- (vi) Annual Income and savings profile; and
- (vii) Other information as may be considered as sensitive and personal.

The aforesaid information is being collected by the AMC/Service Providers to respond to requests, to process the investment applications and to also ensure safe subscriptions/redemptions through points of acceptance in physical form, website, online portals, Automated Teller Machines and such other mode. The AMC may also call the Users to inform them with respect to the other products or services offered by the AMC. The said information is also being collected to be compliant with the Know Your Client (KYC) norms under the Prevention of Money Laundering Act, 2002, (PMLA), the rules issued thereunder, and guidelines and circular on Anti- Money Laundering issued by SEBI and SEBI (Mutual Funds) Regulations, 1996 as amended till date.

The aforesaid information is the basis of the AMC's/ the Mutual Fund's ability to provide Users with good, qualitative, timely and efficient service, while also keeping the information and data provided totally secure and confidential.

For each visitor to the AMC's / the Mutual Fund's website/mobile application, the AMC's web server automatically recognizes the visitor's Internet service provider. Additionally, the AMC/ the Mutual Fund collects information about the sites visitors connect from, and the browsers visitors use. The AMC/ the Mutual Fund uses this information to assemble aggregate information about the visitors to the AMC's / the Mutual Fund's website/mobile

application, and assist with the AMC's / the Mutual Fund's systems administration and problem resolution activities.

The AMC/ the Mutual Fund collects personally identifiable information in order to identify and register a User as an Investor/Client of the AMC/ the Mutual Fund. The information collected will vary depending upon the function the User selects. For example, the User may be required to provide information such as:

- Name
- Account Information
- Address
- PAN Number
- Birthday
- Folio No
- Phone number

If the User supplies the AMC/ the Mutual Fund with e-mail address on-line then the User may receive periodic messages from the AMC/ the Mutual Fund with information on new products and services or upcoming events. If the User supplies the AMC/ the Mutual Fund with postal address on-line then the User may receive periodic mailings from the AMC/ the Mutual Fund with information on new products and services or upcoming events. If the User supplies the AMC/ the Mutual Fund with telephone number on-line then the User may receive telephone calls from the AMC/ the Mutual Fund with information regarding products or services, the User has asked about on-line. The User also may receive telephone calls from the AMC/ the Mutual Fund with information regarding new products and services or upcoming events.

The AMC / the Mutual Fund makes no representations of any kind whatsoever about the content of any such web site that the User may access through the AMC's/ the Mutual Fund's website. The User is advised to read the terms and conditions/disclaimers of such website that may be accessed by the User. The AMC also advises the User to confirm the accuracy of any such information before seeking to rely on such information. The AMC disclaims all liability that the User may incur as a result of relying on any such reports/information and/or accessing any other website and/or any third-party content that may be accessed from the website.

## **6. User Data Collected on the AMC's Website/application, and Access to Data**

The information for the accounts the User has with the AMC/ the Mutual Fund website/application is kept secure and confidential through multiple security features and procedures. The information the User requests from the AMC's / the Mutual Fund's website/mobile application for the User's accounts can only be accessed with the User's password. It is the User's responsibility to keep the password confidential. The User should not disclose the password to anyone. The employees and associates of the AMC/ the Mutual Fund will never ask the User for the User's password. The User should never write the password on something others may see.

The User should contact the AMC/ the Mutual Fund immediately to change the password if the User suspects that someone has discovered it. Information the User submits through the AMC's / the Mutual Fund's website/mobile application, as well as the information the AMC/ the Mutual Fund sends back to the User while the User is visiting

the AMC's/ the Mutual Fund's website/mobile application, is protected while passing through the Internet using strong encryption ("scrambling" to make it incomprehensible) when necessary. The AMC's secure server software encrypts information, ensuring that Internet communications through the AMC's/ the Mutual Fund's website/mobile application stay private and protected. To enable the Users to process transactions at the AMC's / the Mutual Fund's website/mobile application, the AMC/ the Mutual Fund uses cookies.

The User's account information is not permanently stored on the AMC's Web server. The information only resides on the AMC's Web server while the User is viewing the information. It is permanently stored on the AMC's secured corporate computer systems. The AMC's corporate network systems, which store the User's account information, use proven security controls. The AMC has data security staff whose sole responsibilities are to ensure the security of the information the AMC processes and stores.

The AMC / the Mutual Fund has policies and procedures in place to limit access to the User's information to only those who have a business need to view it.

## **7. Objection to Processing**

Where the User's personal information is processed for direct marketing purposes or any contests or promotions or other services, the User may, at any time ask the AMC/ the Mutual Fund to cease processing the User's data for these direct marketing purposes by sending an e-mail to the AMC/ the Mutual Fund.

The Users should be aware that if the User does not allow the AMC/ the Mutual Fund to collect personal information from the User, the AMC/ the Mutual Fund may not be able to deliver certain experiences, and services to the User, and some of the AMC's/ the Mutual Fund's services may not be able to take account of the User's interests and preferences. If collection of personal information is mandatory, the AMC/ the Mutual Fund will make that clear at the point of collection so that the User can make an informed decision whether to apply for the AMC's / the Mutual Fund's services. If the User has questions about the specific personal information about the User that the AMC/ the Mutual Fund processes or retains, and the User's rights regarding that personal information by sending an e-mail to the AMC/ the Mutual Fund.

## **8. Data Use, Retention, Storage, Transfer and Disposal**

The AMC/ the Mutual Fund may retain the data as may be provided by the Users till such time as may be provided under the law and as long as necessary for the AMC/ the Mutual Fund to provide services to the User or the User asks the AMC/ the Mutual Fund to not retain the User's data. The AMC/ the Mutual Fund may retain some of the User's personal information as necessary for the AMC's / the Mutual Fund's legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if the AMC/ the Mutual Fund suspends a user account for fraud or safety reasons, the AMC/ the Mutual Fund may retain certain information from that account to prevent that User from opening a new account in the future.

The AMC/ the Mutual Fund may store and use the User's personal information to the extent necessary to comply with legal obligations. For example, the AMC/ the Mutual Fund may keep some of the User's information for tax, legal reporting and auditing obligations. Additionally, some copies of the User's information (e.g., log records) may

remain in the AMC's database, but are disassociated from personal identifiers. Because of the way the AMC maintains certain services, after the User deletes information, residual copies may take a period of time before they are deleted from the AMC's active servers and may remain in the AMC's backup systems.

The AMC performs the disposal of storage devices and systems in a safe and secure manner whenever such hardware devices/equipments are end of life/end of support to minimize the risk of sensitive information leakage to unauthorized persons. The data /information on such devices and systems are removed as applicable prior to disposal to make the original information non-retrievable.

## **9. Disclosure to third parties**

The AMC/ the Mutual Fund may transfer the User's personal information to the AMC's / the Mutual Fund's partner companies or third parties for the purposes of processing the User's information as part of the AMC's/ the Mutual Fund's customer services. The AMC would ensure to enter into suitable terms with third party service providers in order to protect client confidentiality and follow a non-disclosure or restricted disclosure policy.

The AMC shall reveal only such information to external authorities as may be found relevant and necessary in order to comply with the applicable laws of the land and to third party service providers to ensure smooth functioning of the activities as may be prescribed under applicable laws like Registrar and Transfer Agents/distributors/banks/sub-brokers/call-centers/custodians/depositories and such other entities/persons. The AMC may also be required from time to time to disclose User's personal information to governmental or judicial bodies or agencies or regulators based on their requirement to comply with the applicable laws including cyber laws. Further, such information may also be used by the AMC to generate statistics and reports and/or to protect and defend the rights, interest and property of the Mutual Fund, the AMC, the Trustee Company, Sponsors & its affiliates and directors and/or to enforce legal rights or provisions of the Scheme related Documents of the Mutual Fund viz. Scheme Information Document (SID), Statement of Additional Information (SAI) and Key Information Memorandum (KIM).

Nevertheless, it shall be the AMC's foremost endeavor to ensure that the Customer's Privacy is protected at all points in time. The Users must ensure to recheck the information or data being provided to the AMC or any person acting on its behalf. In case if any of the data/information is found to be inaccurate or incorrect, the same shall be informed to the AMC for immediate amendment. The AMC and any person acting on its behalf shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by the Users (whether existing/prospective).



## 10. Use of Cookies

The AMC's / the Mutual Fund's website viz. [www.unionmf.com](http://www.unionmf.com), like many web sites, uses "cookies" (information stored on the User's computer by the User's browser at the AMC's request). Cookies enable the site to "remember" who the User is so that the User can get around it easily and more efficiently. Cookies allow the User to access secured information, conduct secured transactions, and take advantage of promotional opportunities.

Different web sites store the information in cookies differently. The AMC/ the Mutual Fund does not record personal or sensitive information in the cookies. Any such information is stored in the AMC's/ the Mutual Fund's protected systems and not in the cookie or on the Internet.

This policy describes how the AMC/ the Mutual Fund will handle information the AMC/ the Mutual Fund learns about the User from the User's visit to the AMC's / the Mutual Fund's Web site / mobile application.

If the User visits the AMC's / the Mutual Fund's website / application to read or download information, the AMC/ the Mutual Fund may collect and/or store the following information about the User:

- The name of the domain from which the User accesses the Internet;
- The date and time the User accessed the AMC's / the Mutual Fund's site/ mobile application;
- The Internet address of the Web site / mobile application from which the User linked directly to the AMC's / the Mutual Fund's site;
- The page locations where the User visited, and other miscellaneous site references.

Some pages on the AMC's/ the Mutual Fund's Web site employs "cookies." A cookie is a small file that a Web site transfers to the User's computer's hard disk to allow the server to "remember" specific information about the User session while the User is connected. The AMC / the Mutual Fund may find it necessary to use the "cookies" system to collect data when the User visits the AMC's / the Mutual Fund's web pages / mobile application. This will help the AMC/ the Mutual Fund find out which sections of the pages the User is interested in.

Requests to send cookies are not designed to collect information about the User, but only about the User's "browser session." The cookies make it easier for the User to use the dynamic features of the AMC's / the Mutual Fund's Web site / mobile application. The cookies and the information about the User's session are automatically destroyed shortly after the User closes the browser. The information is not permanently stored on the User's computer. No personal information about the User is collected except as described above.

The primary reason for doing this is to enable the AMC / the Mutual Fund to appreciate, better, the User's centers of interest and send the User information specific to the User's requirements.

This website / application does not collect any personal information that identifies a visitor to the AMC's / the Mutual Fund's site/ application individually unless specified otherwise. The User's visit to the AMC's / the Mutual Fund's site / mobile application will record only the Domain Name Server part of the User's e-mail address and of the pages visited within the AMC's/ the Mutual Fund's website / mobile application. The information the AMC/ the Mutual Fund receives depends upon what the User does when visiting the AMC's/ the Mutual Fund's site. This information is used for management and enhancement of the AMC's/ the Mutual Fund's Web site / mobile application and also to prepare aggregate information about the visitors to the site and statistics on usage patterns.

If the Users identify themselves by sending an e-mail or ordering forms/brochures, the AMC/ the Mutual Fund will only use this information to respond to the Users' request and improve Customer Services.

While every care has been taken in preparing the information and materials contained in the AMC's/ the Mutual Fund's site, such information and materials are provided to the User "as is" without warranty of any kind either express or implied. The AMC / the Mutual does not warranty the adequacy of the information made available. In particular, no warranty regarding non-infringement, security, accuracy, fitness for a particular purpose or freedom from computer virus is given in conjunction with such information and materials.

## **11.Cookies**

"Cookies" will also save the User from having to supply information that the User has previously given, every time the User connects. It will be possible for the User to detect these "cookies" and, if the User wishes, delete them.

Other web connections: hypertext links

The AMC's / the Mutual Fund's web pages / mobile application also offer links to other sites for which the AMC/ the Mutual Fund is not responsible either for their standards of public order and decency, or for their personal data protection policy or the use that could be made of such data.

When the User accesses another website through a hypertext link, the User is accepting that this access is at the User's own risk. Consequently, the AMC/ the Mutual Fund cannot accept responsibility for any direct or indirect damages that may result from the User's access to another site connected by a hypertext link.

The AMC / the Mutual Fund also draws the User's attention to the use of public forums where the User may be asked to give the User's identity or e-mail address. This information then enters the public domain and may be used by a third party using the service.



## **12. Monitoring and enforcement**

The AMC takes appropriate security measures to monitor unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of the AMC's/ the Mutual Fund's data collection, storage and processing practices and security measures. The AMC would ensure to enter into suitable terms with third party service providers in order to protect client confidentiality and follow a non-disclosure or restricted disclosure policy. Further, the employees who violate the privacy and confidentiality promise shall be subjected to disciplinary action.

## **13. Breach of Internet Security**

Despite the AMC's/ the Mutual Fund's best efforts, if unauthorized persons breach the AMC's/ the Mutual Fund's security control measures resulting in the Site being hacked or presenting inaccurate information etc., the AMC, their directors, officers, employees or affiliates, the Mutual Fund will not be responsible.

Unless otherwise stated, the AMC owns the intellectual property rights in the website / mobile application and material on the website / mobile application. The User may view, download for caching purposes only, and print pages from the website / mobile application for the User's own personal use, subject to the restrictions set out in these terms and conditions of use.

## **14. Grievance Redressal:**

If Users have any concerns relating to their personal and sensitive information they may be addressed to Mr Yunus Sagari, Chief Information Security Officer (CISO) of the AMC, at [ciso@unionmf.com](mailto:ciso@unionmf.com) For more details, the Users may refer to the Scheme related documents available on the AMC's / the Mutual Fund's website viz. [www.unionmf.com](http://www.unionmf.com). The Users shall be deemed to have expressly consented to the terms of this Policy if they enter and use the AMC's/ the Mutual Fund's website or provide any information while transacting with the AMC/ the Mutual Fund.

## **15. Amendment to the Policy**

The AMC reserves the right to amend/modify any of the sections of this policy at any time and the Users are requested to keep themselves updated for changes by reading the same from time to time. Any amendments to this Policy shall be placed before the Board of Directors of the AMC for their approval.

**Investors/clients/customers shall have expressly consented to the terms of this Policy if they enter and use this website or provide any information while transacting with us.**