

MAHINDRA MANULIFE INVESTMENT MANAGEMENT PVT. LTD

(INVESTMENT MANAGER TO MAHINDRA MANULIFE
MUTUAL FUND)

DATA PRIVACY POLICY

Change Matrix

Title	Data Privacy Policy
Policy Owner	Information Technology Department
Policy Administrator	Respective Departments as mentioned in the Policy
Policy Adherence by	Respective Departments as mentioned in the Policy
Last updated / reviewed by the Board of Directors (AMC & Trustee Company)	December, 2022
Next Date of Review	October, 2023
Version Number	1.2

Policy on Privacy & Security of Unitholders' Information

Mahindra Manulife Mutual Fund ('Fund') and Mahindra Manulife Investment Management Private Limited ('AMC' or 'MMIMPL'), respects unitholders'/customer's/client's right to privacy.

AMC recognises that the lawful and correct treatment of personal data is very important to maintain investor's confidence.

It is AMC's endeavour to ensure that any personal data collected, processed, recorded, used, and shared with the business associates for the purpose of business operations irrespective of mode whether it is held on paper, on computer or other electronic media will have appropriate safeguards in place to comply with the obligations towards confidentiality and privacy.

This policy covers the recommendations made by the AMFI through its Best Practice circular no. 99/2021-22 on Data Sharing Principles to be followed by AMCs while sharing Unitholders' Data.

Background

Mahindra Manulife Investment Management Private Limited ('AMC' or 'MMIMPL') and its Registrar and Transfer agent (RTA) need to collect certain amount of personal data from its investors for fulfilling the following purposes.

1. Know Your Client (KYC) norms as defined by the regulators
2. Risk & Business Analysis
3. Statutory & Regulatory Audits / Compliance
4. Providing information to governmental agencies such as Income Tax, ED, FIU, SEBI, RBI etc to comply with applicable regulatory requirements and also on specific request
5. Bank Account details for financial transactions and Anti Money Laundering
6. Investor Service (Sending transaction Alerts, account statements, scheme updates & answering queries)
7. RTA, Custodians, MF Platforms, Stock Exchanges as part of Transaction Processing
8. Sharing with Distributors and Registered Investment Advisers through whom Investor initiates transaction

The aforesaid information helps the AMC to provide its investors/clients/customers with good, qualitative, timely and efficient service, while also keeping the information and data provided totally secure and confidential.

Applicability

This policy is applicable to the following people / entities.

1. All employees / staffs including the contracted resources working with MMIMPL.
2. Registrar & Transfer Agent (RTA) responsible for collection, Processing and storing of Investor's data.
3. Distributors and Agents appointed by the AMC for sourcing the business
4. All staffs of Customer Service Center / Call Center engaged by AMC to service their customers.
5. Market Participants / DPs and all other Industry MF platforms including Stock Exchanges doing transactions on behalf of the AMC.
6. PMS, Custodians acting on behalf of investors/FPI.
7. Entities regulated by SEBI or RBI such as NPCI, Banks, Payment Aggregators, Depositories, Clearing Corporations.
8. Other entities / vendors not regulated by SEBI or RBI, acting as service providers to the AMC such as Printers, Email/SMS engines, Marketing Agencies.
9. Any other entity which AMC will engage with whom Investor data is shared for any of the business / operational purposes.

Investor Information

The AMC either directly or through third party service providers engaged by the AMC (Service Providers) such as the Distributors, Registrar and Transfer agents collects, receives, possesses, stores, deals or handles information received from investors/client/customers whether existing or prospective.

Such information which are classified as personally Identifiable and sensitive in nature as per the indicative list given below:

- Name & Address
- PAN & Aadhar
- Bank Account details
- Demat Account details like beneficiary account no. etc.;
- Investment details such as Scheme, Option and Number of Units etc.,
- Annual Income and savings profile; and
- Other information as may be considered as sensitive and personally identifiable.

Appropriate Controls

The AMC will formulate and implement the necessary information Security Policies / Practices from time to time to keep the Investor's information confidential and Secure as required.

The AMC will execute Non-disclosure agreement in its agreements with their business associates for securing the Investor's information.

The data is-

1. Always protected.
2. Used only for the purpose for which it was shared
3. Purged as soon as the data is no longer required to be stored for rendering services for which the data was shared/collected or stored securely (if required to meet any legal or compliance obligation)
4. Not shared with any entity (including group or associate entities) without explicit approval of the AMC or specific consent of the unitholder in accordance with the above referred AMFI guidelines. Further, if any third-party vendor is employed by such entities, the vendor shall be contractually bound by such entities to ensure adherence with the privacy policy, including protection and non-sharing of data.
5. Products & services of group companies shall not be cross marketed.

AMC will incorporate the right to inspect / audit the business associate's process by self or regulatory bodies in the agreement entered with its business associates.

AMC will keep educating their employees / contract staffs on the necessity of data privacy and its controls.

AMC will ensure the access and sharing of Investor data is on "Need to know basis" to its employees, contract staff and service providers. AMC will define and take disciplinary action, if there is any violation / breach to the Privacy policy by any of its employees / contract staff.

AMC endeavours to have suitable technical, operational and physical security controls and measures to protect investors/customers/clients personal/sensitive data or information that are commensurate with the nature of our business at all times. AMC permit's only authorized employees who are trained in the proper handling of investor information, to have access to investor information.

Data Sharing

1. AMC will share transaction data with their distributors / Agents / RIAs /Stock Brokers / MF Platforms / PMS / Custodians acting on behalf of Investors / FPI which are only bearing their ARN / RIA/ SB registration numbers.
2. RTA Will have the full and complete set of Investor data as they are required to process and maintain the same as primary record keeper.
3. AMC shall share only the data with NPCI, Banks and other Payment aggregators which are required for them to fulfil their contracted activities such as third-party verification, reconciliation, credit identification, payment, collection, consolidated account statement, debit/credit alerts, etc.
4. AMC shall share only data with non regulated entities such as Marketing Agencies/ Email & SMS service providers, Printers as may be required by the vendors to render services as per contractual agreement or regulations.
5. AMC, its service providers/agents shall share data with any entity and for any other purpose based on explicit unitholder/investor's consent as follows:
 - i. Through the Account Aggregator ecosystem as notified by SEBI.
 - ii. Through any similar consent artefact as and when notified by SEBI.

Investor's Obligation

The Investor/customers/clients (whether existing/prospective) 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/ RTA 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 Investor/customers/clients (whether existing/prospective).

Sharing of data for statutory requirements and data reported in aggregate

The principles/restrictions listed above shall not be applicable where any data is required to be submitted by AMC/ its service providers/agents to any statutory authority or a regulatory body, court of competent jurisdiction, law enforcement authority or is required to be provided, furnished, or filed under any extant laws, regulations, ordinances, orders or for other statutory or reporting purposes.

It is further clarified that the above principles/restrictions shall not apply where data is only reported in the aggregate without any specific information relating to an identified or identifiable unitholder/person/entity.

Amendments/Modifications

This Privacy Policy is current and valid. However, the AMC reserves the right to amend/modify any of the sections of this policy at any time and the clients/customers/investors are requested to keep themselves updated for changes by reading the same from time to time.

Retention of information/data

It may be noted that AMC may retain the data as may be provided by the client/investors/customers till such time as may be provided under the law and as required to efficiently provide service to the clients/investors/customers.

Grievance redressal

If investors/customers/clients have any concerns relating to their personal and sensitive information they may be addressed to Ms. Pooja Vineet Deherkar, Investor Relations Officer/Grievance Officer. For more details please refer to the Scheme related documents available on our website viz. www.mahindramanulife.com