PRIVACY POLICY

FM TRADE

A brand of Finance Monitor India Private Limited

Last Updated: 18 September 2026 | Effective Date: 18 September 2026

1. INTRODUCTION

This Privacy Policy ("Policy") describes how Finance Monitor India Private Limited ("Company," "we," "us," "our"), the owner and operator of the FM Trade trading application, platform, and associated services (collectively, the "Platform" or "Services"), collects, uses, discloses, stores, and protects personal data of users ("you," "User," "Client").

This Policy is published in compliance with:

- The Digital Personal Data Protection Act, 2023 ("DPDP Act") and rules made thereunder;
- The Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("SPDI Rules");
- Applicable regulations of the Securities and Exchange Board of India ("SEBI"), stock exchanges, depositories, and self-regulatory organizations governing broking, investment advisory, and related intermediary activities;
- Reserve Bank of India ("RBI") guidelines applicable to payment processing and financial data, where relevant; and
- Other applicable data protection and consumer protection laws of India.

By accessing or using FM Trade, you consent to the collection, use, storage, disclosure, and processing of your information as described in this Policy. If you do not agree with this Policy, please do not use the Platform.

2. DEFINITIONS

- **"Personal Data"** means any data about an individual who is identifiable by or in relation to such data, as defined under the DPDP Act.
- **"Sensitive Personal Data"** includes financial information, bank account/payment instrument details, biometric data, and other categories specified under the SPDI Rules.
- **"Processing"** means any operation performed on Personal Data, including collection, storage, use, sharing, disclosure, or erasure.
- **"Data Fiduciary"** means Finance Monitor India Private Limited, which determines the purpose and means of processing your Personal Data.
- **"Data Principal"** means you, the individual to whom the Personal Data relates.

3. INFORMATION WE COLLECT

3.1 Information You Provide Directly

- **Identity information:** Full name, date of birth, gender, photograph, signature.
- **Contact information:** Email address, mobile number, residential and correspondence address.
- **KYC (Know Your Customer) information:** PAN, Aadhaar (masked/where legally permitted), passport, voter ID, or other government-issued identity documents; income proof; occupation details.
- **Financial information:** Bank account details, UPI IDs, payment instrument details, demat account number, trading account details, income range, net worth declarations, tax information.
- **Investment profile information:** Risk appetite, investment objectives, trading experience, and suitability assessment responses.
- **Communications:** Information you provide when contacting customer support, submitting grievances, or participating in surveys.

3.2 Information Collected Automatically

- **Device information:** Device ID, IP address, device model, operating system, browser type, mobile network information.
- **Usage information:** Log data, app interaction data, pages/screens viewed, features used, order history, time and duration of sessions, crash reports.
- **Location information:** Approximate or precise geolocation, where permitted by you, for fraud prevention and regulatory compliance.
- **Cookies and tracking technologies:** As described in Section 9.

3.3 Information from Third Parties

- KYC Registration Agencies (KRAs), CKYC records, credit bureaus, and identity verification service providers.
- Stock exchanges, depositories (NSDL/CDSL), clearing corporations, and banks for trade settlement and reconciliation.
- Payment gateway providers and payment aggregators for transaction processing.
- Publicly available sources, where relevant for regulatory or compliance checks (e.g., PEP/sanctions screening).

4. PURPOSE AND LEGAL BASIS FOR PROCESSING

We process your Personal Data for the following purposes, on the legal bases indicated:

Purpose	Legal Basis
Account opening, KYC verification, and onboarding	Consent; legal obligation under SEBI/PMLA/RBI norms
Execution of trades, settlement, and portfolio management	Contractual necessity
Regulatory reporting to SEBI, exchanges, depositories, FIU-IND	Legal/regulatory obligation

Purpose	Legal Basis
Fraud prevention, risk management, and security monitoring	Legitimate interest
Customer support and grievance redressal	Contractual necessity; consent
Marketing communications and product updates	Consent (with opt-out available)
Analytics, app performance improvement	Consent/legitimate interest
Compliance with court orders, law enforcement requests	Legal obligation

Where processing relies on consent, you have the right to withdraw such consent at any time, subject to Section 8, without affecting the lawfulness of processing carried out prior to withdrawal.

5. HOW WE SHARE YOUR INFORMATION

We do **not** sell your Personal Data. We may share your information only in the following circumstances:

1. **Regulatory and statutory bodies:** SEBI, stock exchanges (NSE/BSE/MCX, etc.), depositories (NSDL/CDSL), clearing corporations, RBI, Financial Intelligence Unit-India (FIU-IND), Income Tax authorities, and other government/regulatory authorities as mandated by law.
2. **Service providers and processors:** KYC verification agencies, payment gateways, cloud hosting and data storage providers, SMS/email service providers, customer support tools, and analytics providers — bound by contractual confidentiality and data protection obligations.
3. **Banking and payment partners:** For processing of deposits, withdrawals, and fund settlements.
4. **Professional advisors:** Auditors, legal counsel, and consultants, on a need-to-know basis.
5. **Business transfers:** In connection with a merger, acquisition, restructuring, or sale of assets, subject to equivalent privacy protections.
6. **Legal requirements:** Where disclosure is required to comply with applicable law, judicial process, or governmental request, or to protect the rights, property, or safety of the Company, our users, or the public.
7. **With your consent:** For any other purpose, only with your explicit consent.

All third parties with whom data is shared are contractually obligated to implement appropriate security safeguards and to use the data solely for the specified purpose.

6. DATA STORAGE, SECURITY, AND RETENTION

6.1 Security Measures

We implement industry-standard technical and organizational security measures, including:

- Encryption of data in transit (TLS/SSL) and at rest;
- Multi-factor authentication for account access;
- Role-based access controls and audit logging;

- Regular vulnerability assessments and penetration testing;
- Secure data centers with physical and network security controls.

Despite these measures, no method of electronic transmission or storage is 100% secure, and we cannot guarantee absolute security.

6.2 Data Storage Location

Personal Data is primarily stored on servers located within India, in accordance with applicable data localization requirements for financial and payment data. Any cross-border transfer of data (e.g., to cloud service providers) will be carried out in compliance with the DPDP Act and only to jurisdictions/entities that ensure adequate protection.

6.3 Retention Period

We retain Personal Data for as long as necessary to:

- Fulfil the purposes outlined in this Policy;
- Comply with statutory record-keeping requirements under SEBI regulations, PMLA, and Companies Act, 2013 (generally a minimum of 5–8 years from the date of transaction or account closure, or longer if mandated); and
- Resolve disputes and enforce our agreements.

Upon expiry of the applicable retention period, data will be securely deleted or anonymized, unless further retention is required by law.

7. YOUR RIGHTS AS A DATA PRINCIPAL

Subject to applicable law, you have the right to:

- **Access** a summary of the Personal Data we hold about you and the processing activities undertaken;
- **Correction and updating** of inaccurate or incomplete Personal Data;
- **Erasure** of Personal Data that is no longer necessary for the purpose it was collected, subject to statutory retention obligations;
- **Withdraw consent** for processing that is based on consent, without affecting past lawful processing;
- **Grievance redressal** through our designated Grievance Officer (see Section 11);
- **Nominate** a representative to exercise your rights in the event of death or incapacity, as permitted under the DPDP Act.

To exercise these rights, submit a request through the app's "Privacy Settings" section or contact us using the details in Section 17. We will respond within the timeframe prescribed under applicable law.

8. MARKETING COMMUNICATIONS AND OPT-OUT

You may receive promotional communications (SMS, email, push notifications, WhatsApp) regarding products, features, and offers. You may opt out at any time via:

- In-app notification settings;
- The "unsubscribe" link in promotional emails;
- Registering your number on the National Customer Preference Register (NCPR/DND).

Opting out of marketing communications does not affect transactional or regulatory communications (e.g., contract notes, margin calls, KYC alerts), which are mandatory.

9. COOKIES AND TRACKING TECHNOLOGIES

FM Trade uses cookies, SDKs, and similar tracking technologies to:

- Authenticate sessions and maintain login state;
- Remember preferences and settings;
- Analyze usage patterns and improve app performance;
- Detect fraudulent or unauthorized activity.

You may control cookie preferences through your device/browser settings; however, disabling certain cookies may limit functionality of the Platform.

10. CHILDREN'S PRIVACY

FM Trade is intended for use only by individuals who are 18 years of age or older and legally competent to enter into a contract under the Indian Contract Act, 1872. We do not knowingly collect Personal Data from minors. If we become aware that data of a minor has been collected without appropriate consent, we will take steps to delete such data promptly. Data of a minor as a nominee to the primary/main applicant shall be collected and stored with explicit consent only.

11. GRIEVANCE OFFICER AND DATA PROTECTION CONTACT

In accordance with the Information Technology Act, 2000, the DPDP Act, and SEBI regulations, we have appointed a Grievance Officer / Data Protection Officer:

Name	Saloni Parikh
Designation	Grievance Officer / Data Protection Officer
Address	Finance Monitor India Private Limited, Churchgate, Mumbai 400020
Email	operations@fmipl.in
Phone	022 6253 4416
Working Hours	10:00 AM – 5:30 PM IST, Monday–Friday

Grievances will be acknowledged and resolved within the timelines prescribed under applicable law (generally 30 days, or shorter timelines as mandated for SEBI-regulated intermediaries).

If unsatisfied with the resolution, you may escalate the matter to:

- **The SEBI SCORES portal** (https://scores.sebi.gov.in), for grievances related to trading/broking services; or
- **The Data Protection Board of India**, once constituted under the DPDP Act.

12. DATA BREACH NOTIFICATION

In the event of a Personal Data breach that is likely to result in harm to you, we will notify affected users and, where required, the Data Protection Board of India and other relevant regulators, in accordance with the timelines and procedures prescribed under the DPDP Act and applicable SEBI cybersecurity and resilience framework requirements.

13. THIRD-PARTY LINKS AND INTEGRATIONS

The Platform may contain links to third-party websites, payment gateways, or services not operated by us. This Policy does not apply to such third-party platforms, and we encourage you to review their respective privacy policies. We are not responsible for the privacy practices of third parties.

14. INTERNATIONAL USERS

FM Trade is intended for use by residents of India in compliance with Indian securities laws. If accessed from outside India, users are responsible for compliance with local laws. We do not knowingly target users outside India for trading/investment services.

15. CHANGES TO THIS POLICY

We may update this Policy periodically to reflect changes in legal, regulatory, or business requirements. Material changes will be notified to you via the app, email, or SMS at least 5 days before the changes take effect. Continued use of the Platform after such changes constitutes acceptance of the revised Policy.

16. CONSENT

By registering for, accessing, or using FM Trade, you expressly consent to:

- The collection, processing, storage, and sharing of your Personal Data as described in this Policy;
- Receipt of transactional, regulatory, and (where opted-in) promotional communications; and
- The terms of this Policy as amended from time to time.

17. CONTACT US

Entity	Finance Monitor India Private Limited (Brand: FM Trade)
Registered Office	403-B, Dalamal Chambers, 29, New Marine Lines, Churchgate, Mumbai 400020
SEBI Registration No.	INZ000250337
Email	operations@fmipl.in
Phone	022 6253 4416

Working Hours	10:00 AM – 5:30 PM IST, Monday–Friday
Website	www.financemonitor.in

This Privacy Policy should be read in conjunction with FM Trade's Terms and Conditions, Risk Disclosure Document, account-opening agreements executed with Finance Monitor India Private Limited, and any other documents or policies published or executed from time to time.

ACKNOWLEDGEMENT

This Privacy Policy constitutes a legally binding document between the User and Finance Monitor India Private Limited (operating under the brand FM Trade). By signing into the App & clicking "I Agree," creating an account, or otherwise accessing or using the Platform, the User acknowledges that they have read, understood, and agree to be bound by the terms of this Privacy Policy.

Finance Monitor India Private Limited