

Privacy Policy

This privacy commitment (“**Privacy Commitment**”) functions as an ‘electronic record’ under Section 2(t) of the Information Technology Act, 2000. It is published in compliance with the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, as amended, re-enacted, or replaced from time to time.

Protecting your personal information is a core priority. **Hijli Investment Advisors Private Limited** (hereinafter referred to as “**HIAPL**”) is committed to maintaining the confidentiality and security of your data. This Privacy Commitment outlines our practices regarding the collection, utilization, sharing, and processing of your personal information.

While the Platform is owned, operated, or managed by Hijli Labs Private Limited (or other authorized service providers), we expressly acknowledge that all regulated financial activities, including the provision of Investment Advice and related Services, are performed solely by Hijli Investment Advisors Private Limited in its capacity as a SEBI-registered Investment Adviser. Hijli Labs Private Limited acts strictly as a technology provider and does not engage in, nor is it responsible for, any regulated investment advisory activities.

Please read this Privacy Commitment thoroughly before accessing our platforms, using our applications, or communicating with us. By sharing information with us, you acknowledge the terms set forth herein.

1. Definitions

For the purposes of this Privacy Commitment:

- (i) “**Data**” refers to any information accessed or processed by **HIAPL** resulting from your interaction with our Platform or Website.
- (ii) “**Data Protection Laws**” encompasses all applicable statutes relating to data processing, including the Information Technology Act, 2000, the 2011 Privacy Rules, and the Digital Personal Data Protection Act, 2023, along with any subsequent amendments.
- (iii) “**Entity**” includes any company, firm, corporation, partnership, trust, or joint venture.
- (iv) “**Governmental Authority**” refers to any local, state, or central government, regulatory body, judicial authority, or self-regulatory organization established under law.
- (v) “**HIAPL Services**” refers to the suite of services provided by us, including but not limited to investment advisory, implementation support, and wealth assessments.
- (vi) “**HIAPL**” / “**us**” / “**we**” means **Hijli Investment Advisors Private Limited** a company incorporated in India with its registered office at Om Chambers, 648/A, 4th Floor, Binnamangala 1st Stage, Indiranagar, Bangalore, Karnataka- 560038
- (vii) “**Platform**” signifies the websites, mobile applications, and technology interfaces owned and managed by HIAPL and/or through technology platforms owned, operated or managed by Hijli Labs Private Limited (“Hijli Labs”) or other authorized service providers.
- (viii) “**Terms and Conditions**” means the governing rules for the use of our Services and Platform.
- (ix) “**Website**” refers to www.hijliadvisors.com and includes any sub-domains, mobile sites, or specific pages unless explicitly excluded by their own terms.
- (x) “**You**” refers to any individual or entity visiting, accessing, or utilizing our Website, Platform, or Services.

1A. Data Fiduciary and Data Processor

Hijli Investment Advisors Private Limited acts as a “Data Fiduciary” under the Digital Personal Data Protection Act, 2023 in respect of personal data collected for advisory and related services.

Hijli Labs Private Limited, being the owner and operator of the underlying technology infrastructure, acts strictly as a “Data Processor” and processes personal data solely in accordance with documented instructions of HIAPL and in compliance with applicable Data Protection Laws.

2. External Links and Third Parties

Our Platform may contain links to external websites, including those of affiliates or third parties. **HIAPL** does not control the privacy practices of these external sites. We are solely responsible for data collected directly through our own Platform. We encourage you to review the privacy policies of any third-party site you visit, as we do not endorse or assume liability for their content, products, or data handling practices.

3. Collection of Information

3.1 To provide our specialized services, **HIAPL** may collect information including:

- 3.1.1 Full name, gender, date of birth, and marital status;
- 3.1.2 Contact details such as residential address, email, mobile number, and nominee information;
- 3.1.3 Verification documents including PAN, KYC status, photographs, and signatures;
- 3.1.4 Financial details such as bank account numbers or payment instrument data;
- 3.1.5 Any other data necessary for the effective delivery of **HIAPL** Services.

3.2 We may identify your approximate location via the IP address used to access our services.

3.3 All data is managed on a ‘need-to-know’ basis, ensuring restricted access and high security.

3.4 Personal data shall be retained only for as long as necessary to fulfil the purposes for which it was collected, or as required under Applicable Law.

Without prejudice to the foregoing, where data relates to investment advisory services, records shall be retained for the minimum period prescribed under the SEBI (Investment Advisers) Regulations, 2013 and any other applicable regulatory requirements.

4. Utilization of Data

4.1 We process your personal data for the following objectives:

- 4.1.1 Fulfilling your requests for **HIAPL** Services and managing platform access;
- 4.1.2 Preventing fraud and ensuring the legal protection of **HIAPL** and its affiliates;
- 4.1.3 Regulatory compliance, record-keeping, and responding to law enforcement;
- 4.1.4 Improving our offerings through market research and activity tracking;
- 4.1.5 Personalizing your user experience and tailoring communication to your preferences;
- 4.1.6 Conducting audits, data analysis, and risk management to ensure business continuity.

4.2 You hereby consent to the sharing of your data with our group entities, execution partners, AMCs, registrars, banks, and relevant Governmental Authorities as required for service delivery.

5. Cookies and Advanced Analytics

5.1 We use cookies to enhance your browsing experience, remember preferences, and secure your session. You may manage or disable cookies through your browser settings, though this may limit certain functionalities of the Platform.

5.2 We may utilize automated analytical tools or artificial intelligence to monitor and assess investment performance. You acknowledge that data may be processed by these tools to provide accurate insights.

6. User Rights and Obligations

6.1 You represent that you are at least 18 years of age and possess the legal capacity to enter into this agreement.

6.2 **Your Rights:** You have the right to access, update, or correct your data. You may also request a copy of your records or withdraw your consent for future processing. To exercise these rights, please contact our **Grievance Officer**.

6.3 **Opt-Out:** While providing data is voluntary, choosing not to provide it or withdrawing consent may result in the inability to access certain **HIAPL** Services or Platform features.

6.4 **Prohibited Conduct:** Users are prohibited from hacking, data mining, spamming, or circumventing the security of the Platform.

7. Governance and Amendments

7.1 **Severability:** If any part of this commitment is found unenforceable, the remaining provisions shall continue in full force.

7.2 **Updates:** **HIAPL** reserves the right to modify this Privacy Commitment. Changes take effect immediately upon posting to the Website.

7.3 **Jurisdiction:** This policy is governed by Indian law. Any disputes shall be subject to the exclusive jurisdiction of the courts in Bangalore, India.

8. Grievance Redressal

If you have questions or concerns regarding your privacy, please reach out to our designated officer:

Grievance Officer: Mr. Madhuker Priyesh

Email: investment.advisor@handauncle.com

Address: Om Chambers, 648/A, 4th Floor, Binnamangala 1st Stage, Indiranagar, Bangalore, Karnataka- 560038

Phone: +91 63642 74232