

Data Protection and Privacy Policy

Neo, on behalf of its clients, collect, record and use personal data of the investors, including past, present and prospective in order to carry omits business as per contractual obligation and meet its clients' requirements effectively. We recognize that the lawful and correct treatment of personal data is very important to successful operations and to maintaining investor's confidence in ourselves and in our clients.

Any personal data that we collect record or use in any way whether it is held on paper, on computer or other electronic media will have appropriate safeguards applied to it to ensure that we comply with our contractual obligations of confidentiality and privacy. Any sensitive information mentioned below as provided by the clients for providing service or received from the investors or through their agents or any through other third party engaged by the clients for processing, stored or processed under lawful contract or otherwise, both historic and ongoing are being used strictly for the purpose for which it has been collected (i.e.) in order to carry on its business and meet clients' requirements and deliverables effectively.

Sensitive Information

i. Investor Bank Account details provided either as part the application submitted by the investor the clients or based on written request such as change of bank account or registration of multiple bank accounts. ii. Payment instrument details provided as part of application at the time of investment or as proof for carrying out change of bank account or any other Details of debit card obtained. iii. Generation and storing password (PIN) in encrypted form based on the request from the investor. iv. Biometric information obtained, if any. v. Physical, physiological and mental health condition. vi. Sexual orientation. vii. Medical records and history birth of electronic funds transfer technology the fast movement of funds through multiple jurisdictions often with different laws, creates major problems for investigators of identification, access and ultimately achieving successful prosecutions.

The above information collected is stored in a secure manner which complies with standards. We aspire to adhere to certain generally accepted principles of data protection, to the extent these are in our control as intermediaries.

These general principles state that personal data must be

- i. Fairly and lawfully collected and processed.
- ii. Processed for limited purposes and not in any other way which would be incompatible with those purposes.
- iii. Accurate and kept up to date.
- iv. Not kept for longer than is necessary.
- v. Kept secure.

In order to meet the requirements of the principles, following process and controls are adhered

- i. observe ethical practices regarding the fair collection and use of personal data.
- ii. Collect and process appropriate personal data only to the extent that we are obliged to by contract or to comply with any legal requirements.
- iii. Ensure the quality of personal data used.
- iv. Hold the data only as long as we are required to by contractor by law.
- v. Take appropriate security measures to safeguard personal data.

We have a responsible data security policy and implemented technology and policies with the objective of protecting your privacy from unauthorized access and improper use.

We provide details of investors only based on consent from our clients to their appointed brokers, agents, bankers and similar representatives, and to our client in whose products he has invested and to any other intermediaries to fulfill business obligation.

We may be required from time to time to disclose your personal information to governmental or judicial bodies or agencies or our regulators based on their requirement.

We will permit only authorized employees who are trained in the proper handling of customer information, to have access to that information. Employees who violate our Privacy Promise will be subject to our normal disciplinary process.

Name of the Officer: Mr. Hardik Shah Address: 1701, One Lodha Place Neo Apex Share Broking Services Llp Senapati Bapat Marg Lower Parel Mumbai - 400013 Phone No: +91-9819077004 Email Id: hardik@neoapex.in. The users of the computer resources including website of Neo Apex or any victim who has suffered due to access or usage of the sensitive information shall notify the complaints, if any to the above officer either through email or written complaint and such complaint shall be redressed within one month from the date of receipt of the complaint