

CITRUS ADVISORS

Privacy Policy

SEBI Registration No.: INP000008206 | www.citrusadvisors.com | support@citrusadvisors.com

IMPORTANT NOTICE: This Privacy Policy is governed by the Digital Personal Data Protection Act, 2023 (DPDP Act) and the DPDP Rules, 2025, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (IT Rules), and applicable SEBI regulations. Please read this policy carefully before using our website or sharing your personal data with us.

1. About Us

Citrus Advisors Private Limited (hereinafter referred to as 'Citrus Advisors', 'we', 'us', or 'our') is a SEBI-registered Portfolio Management Services (PMS) provider. We are registered with the Securities and Exchange Board of India (SEBI) under the SEBI (Portfolio Managers) Regulations, 2020.

Registered Office: 1020, Chandak Unicorn, Dattaji Salve Marg, off Veera Desai Road, Andheri West, Mumbai - 400053, Maharashtra, India.

For all privacy-related queries, please contact us at: support@citrusadvisors.com

2. Scope of This Policy

This Privacy Policy applies to:

- All visitors to our website at www.citrusadvisors.com
- Prospective clients who submit enquiries or contact us through our website
- Existing clients whose personal data is processed by us in the course of providing Portfolio Management Services
- Any individual whose personal data we collect, store, process, or handle in any manner

This policy does not apply to third-party websites that may be linked from our website. We are not responsible for the privacy practices of such third parties.

3. Our Role as Data Fiduciary

Under the Digital Personal Data Protection Act, 2023, Citrus Advisors acts as a 'Data Fiduciary' — we determine the purpose and means of processing your personal data. We are responsible for ensuring that your personal data is processed lawfully, fairly, and transparently, in accordance with the DPDP Act and applicable SEBI regulations.

4. Personal Data We Collect

4.1 Data Collected Through Our Website

- Name, email address, phone number (when you submit a contact/enquiry form)
- Usage data including IP address, browser type, pages visited, and time spent (via cookies or analytics tools)
- Any information you voluntarily provide in free-text fields or messages

4.2 Data Collected During Client Onboarding (PMS)

- Full legal name, date of birth, gender, nationality
- PAN, Aadhaar (as required for KYC under SEBI regulations and PMLA)
- Address, contact details, email
- Bank account details and financial information
- Income, net worth, and investment profile details
- Demat account and depository information
- Risk profile, investment objectives, and preferences
- Copies of identity and address proof documents

4.3 Sensitive Personal Data

To the extent that any data collected constitutes 'sensitive personal data' as defined under the IT Rules (such as financial information, identity documents), we handle such data with additional care and in accordance with applicable law.

5. Purpose and Legal Basis for Processing

We collect and process your personal data for the following purposes:

- To respond to your enquiries and provide information about our services
- To conduct KYC verification and client onboarding as required under SEBI (Portfolio Managers) Regulations, 2020 and the Prevention of Money Laundering Act, 2002 (PMLA)
- To provide Portfolio Management Services and manage your investment portfolio
- To communicate with you regarding your portfolio, transactions, reports, and regulatory disclosures
- To comply with our legal and regulatory obligations under SEBI, PMLA, Income Tax Act, and other applicable laws
- To improve our website, services, and user experience
- To send you informational and educational content about financial markets (with your consent)
- To detect and prevent fraud, money laundering, and other illegal activities

Under the DPDP Act, 2023, the primary legal bases for our processing are: (a) your consent, which you may withdraw at any time; and (b) certain legitimate uses as specified under Section 7 of the DPDP Act, including compliance with legal obligations.

6. Consent

Where we rely on your consent to process your personal data, we will obtain it in a clear, specific, and informed manner before processing. You have the right to withdraw your consent at any time by contacting us at support@citrusadvisors.com.

Please note that withdrawal of consent may affect our ability to provide certain services to you, particularly where processing is necessary for delivery of those services or compliance with regulatory obligations.

For clients subject to mandatory KYC and regulatory requirements under SEBI and PMLA, certain data processing is required by law, irrespective of consent.

7. Sharing of Personal Data

We do not sell, rent, or trade your personal data to any third party for commercial purposes. We may share your data only in the following limited circumstances:

- Regulatory and Legal Compliance: With SEBI, PMLA authorities, KYC Registration Agencies (KRAs), depositories, and other regulatory bodies as required by law
- Service Providers and Processors: With custodians, brokers, technology service providers, auditors, and legal advisors who assist in delivering our services — subject to appropriate data processing agreements
- Legal Obligations: Where disclosure is required by law, court order, or government authority
- Business Transfers: In the event of a merger, acquisition, or restructuring, with appropriate notice to you

All third parties with whom we share your data are required to maintain the confidentiality and security of your personal data and are not permitted to use it for any other purpose.

8. Cross-Border Data Transfers

Where we transfer your personal data outside India, we do so only to countries that are not restricted by the Government of India under the DPDP Act, 2023, and ensure appropriate safeguards are in place. We will update this policy if the Government of India notifies any restrictions on data transfers to specific countries.

9. Data Retention

We retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including to comply with our legal, regulatory, and contractual obligations. Specifically:

- KYC and client records are retained for a minimum of 5 years after the end of the client relationship, as required under PMLA and SEBI regulations
- Transaction records and portfolio data are retained in accordance with applicable SEBI guidelines
- Website usage data and enquiry data are retained for a period not exceeding 24 months

After the applicable retention period, your data will be securely deleted or anonymised.

10. Your Rights as a Data Principal

Under the Digital Personal Data Protection Act, 2023, you have the following rights:

- Right to Access: The right to obtain confirmation of whether we process your personal data and access to such data
- Right to Correction: The right to correct inaccurate or incomplete personal data
- Right to Erasure: The right to request deletion of your personal data (subject to legal and regulatory retention obligations)
- Right to Grievance Redressal: The right to have your grievances addressed in a timely manner
- Right to Nominate: The right to nominate another individual to exercise your data rights in the event of your death or incapacity
- Right to Withdraw Consent: The right to withdraw consent at any time, where processing is consent-based

To exercise any of the above rights, please write to us at support@citrusadvisors.com with the subject line 'Data Rights Request'. We will acknowledge your request within 72 hours and endeavour to resolve it within 30 days.

If your grievance is not resolved to your satisfaction, you have the right to approach the Data Protection Board of India once it is operationally established under the DPDP Act.

11. Data Security

We implement reasonable technical and organisational security measures to protect your personal data from unauthorised access, disclosure, alteration, or loss. These include:

- Encryption of data in transit and at rest
- Access controls and authentication mechanisms
- Regular security audits and vulnerability assessments
- Employee training on data protection

In the event of a personal data breach that is likely to result in harm to you, we will notify the Data Protection Board of India and the affected individuals promptly, as required under the DPDP Act, 2023 and DPDP Rules, 2025. All breaches, regardless of severity, will be reported to the Board.

As a SEBI-registered Portfolio Manager, we comply with the SEBI Cybersecurity and Cyber Resilience Framework (CSCRF) issued vide SEBI Circular No. SEBI/HO/ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024. In accordance with this framework, all client data and personal data processed in relation to our SEBI-regulated activities is stored on servers located within India (data localisation). Encryption keys and key management operations are maintained within the boundaries of India. We conduct regular vulnerability assessments and maintain an incident response plan in line with CSCRF requirements.

12. Cookies and Tracking Technologies

Our website may use cookies and similar tracking technologies to improve your browsing experience, analyse website traffic, and understand how visitors use our site. We use:

- Essential Cookies: Necessary for the website to function correctly
- Analytics Cookies: To understand how visitors interact with our website (e.g., Google Analytics or equivalent)

You may control or disable cookies through your browser settings. Please note that disabling cookies may affect certain functionalities of our website. Where required under applicable law, we will seek your consent before placing non-essential cookies.

13. Data of Children

Our services are not directed at individuals under the age of 18 years. We do not knowingly collect personal data from children. If we become aware that we have inadvertently collected personal data from a minor without verifiable parental consent, we will take steps to delete such data promptly. If you believe we may have collected data from a child, please contact us immediately at support@citrusadvisors.com.

14. Grievance Officer

In accordance with the IT Rules, 2011, and in anticipation of obligations under the DPDP Act, 2023, we have designated a Grievance Officer for privacy-related concerns:

Grievance Officer: [Name of Designated Officer]

Citrus Advisors Private Limited

1020, Chandak Unicorn, Dattaji Salve Marg, off Veera Desai Road, Andheri West, Mumbai - 400053

Email: support@citrusadvisors.com

Your grievance will be acknowledged within 48 hours and resolved within 30 days of receipt.

In addition, as required by SEBI's Master Circular for Portfolio Managers, clients may also lodge complaints directly with SEBI through the SEBI Complaints Redress System (SCORES) at <https://scores.sebi.gov.in> or via the SCORES mobile application. We encourage clients to use SCORES for any unresolved complaints relating to our services.

In accordance with SEBI's Master Circular for Portfolio Managers, we publicly disclose data pertaining to all investor complaints received (including SCORES complaints) on our website on a monthly basis, by the 7th of each succeeding month. This includes pending complaints at the start of the month, new complaints received, complaints resolved, and complaints pending at month-end. This information is available on the Investor Complaints section of our website.

15. Investor Charter

As mandated by SEBI's Master Circular for Portfolio Managers, Citrus Advisors publishes an Investor Charter on its website. The Investor Charter is a separate document prepared in plain language that sets out, in one place, the services we provide, estimated timelines for key activities (such as account opening and periodic reporting), the investor grievance redressal mechanism, and the responsibilities of investors.

The Investor Charter is prominently displayed on our website at www.citrusadvisors.com. We encourage all prospective and existing clients to read the Investor Charter alongside this Privacy Policy to understand the full scope of their rights and our obligations as a SEBI-registered Portfolio Manager. The grievance redressal timelines contained in the Investor Charter apply to all service-related complaints; this Privacy Policy governs the handling of data-related requests and complaints separately.

16. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or regulatory guidelines. We will notify you of material changes by posting the updated policy on our website with a revised 'Last Updated' date. We encourage you to review this policy periodically.

Continued use of our website or services after any changes to this policy constitutes your acceptance of the updated policy.

17. Governing Law and Jurisdiction

This Privacy Policy is governed by and construed in accordance with the laws of India, including the Digital Personal Data Protection Act, 2023, the Information Technology Act, 2000, and applicable SEBI regulations. Any disputes arising out of or in connection with this policy shall be subject to the exclusive jurisdiction of the courts at Mumbai, Maharashtra.

18. Contact Us

For any questions, concerns, or requests related to this Privacy Policy or the processing of your personal data, please contact us:

Citrus Advisors Private Limited

1020, Chandak Unicorn, Dattaji Salve Marg, off Veera Desai Road, Andheri West, Mumbai - 400053

Email: support@citrusadvisors.com

Website: www.citrusadvisors.com