

PRIVACY POLICY

Last Updated: 28 July, 2025

1. INTRODUCTION

Angel Financial Advisors Private Limited (“AFAPL,” “we,” “us,” or “our”) respects your privacy and is committed to safeguarding your personal information in accordance with applicable data protection laws, including the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, the Digital Personal Data Protection Act, 2023, and the guidelines issued by the **Insurance Regulatory and Development Authority of India (IRDAI)**, as amended and notified from time to time. AFAPL is registered as a Corporate Agent with the IRDAI under License No. **CA0252**, which is valid from **01April-2025 to 31-March-2028**, for procuring and soliciting insurance business for Life, General, and Health insurance products.

This privacy policy (“**Privacy Policy**”) outlines our practices and policies regarding the collection, processing, sharing, and protection of your personal data received through our Insurance Platform accessible via the Angel One Super App and the Angel One Website, and during the course of our Services. Before submitting any information on the Insurance Platform, we strongly encourage you to carefully review this Privacy Policy to understand how we will handle, use, and safeguard your personal data in accordance with applicable laws and regulatory requirements.

All capitalized terms used and not defined in this Privacy Policy shall have the meaning ascribed to them under our Insurance Terms and Conditions (“**Terms**”).

2. ACCEPTANCE OF THE PRIVACY POLICY

By accessing or using the Insurance Platform and/or proceeding with the purchase or use of Insurance Products, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy as well as our Terms. Your continued use of the Insurance Platform constitutes your consent to the collection, use, storage, and sharing of your information as described herein. This Privacy Policy is incorporated into and subject to our Terms.

This Privacy Policy (i) is an electronic record under the Information Technology Act, 2000 read with rules and regulations made thereunder and is generated by a computer system; and (ii) will not require any physical, electronic, or digital signature.

3. SCOPE OF THIS POLICY

This Privacy Policy applies to all personal data collected through our interactions with you, including but not limited to:

- a. When you engage with AFAPL’s Services as a client.
- b. When you visit or interact with the Insurance Platform.

- c. When you provide personal information during KYC (Know Your Customer) procedures, advisory services, insurance policy processing, or any other financial services to us or any of our service providers in this regard.

4. INFORMATION WE COLLECT

We may collect and process the following categories of personal data:

- a. **Personal Identification Information:** Name, date of birth, gender, marital status, family or dependents' details, identity proofs (Aadhaar, PAN, passport, etc.).
- b. **Contact Information:** Email addresses, phone numbers, residential and mailing addresses.
- c. **Financial Information:** Income details, tax-related information and other financial information.
- d. **Vehicle Information:** vehicle details, driving license, registration plate number, make, model, year and other details about the relevant vehicle.
- e. **Health Information:** Relevant medical history, current health conditions, and treatments, as needed for Life and Health insurance products.
- f. **Insurance-Related Information:** Policy numbers, claims history, nominee details, premiums, and risk-related information.
- g. **KYC Data:** Identity verification data as required under the **Prevention of Money Laundering Act, 2002**, associated guidelines and as per applicable law.
- h. **Website/App Usage Data:** IP addresses, browser type, cookies, and similar technologies to track online interactions.
- i. Such other information as may be required based on the nature of the insurance product availed by you.

We may obtain some of your information including personal data from third parties, or from publicly available sources. The third parties from who we obtain your information include our business partners, independent service providers, our group entities, various merchants, marketplaces, re-sellers, banks, payment partners, payment aggregators, payments systems, payment service providers, financial institutions and from credit reference agencies and credit bureaus on your behalf. You hereby provide your consent for us to do so subject to the applicable law for the time being in force.

However, we do not voluntarily or actively collect, use or disclose personal data of minors according to the minimum age equivalent in the relevant jurisdiction or of persons with disability, without the prior verifiable consent of the parents or guardians of the minor, as required under applicable laws. If we learn that we have collected the personal data of a minor, without first receiving a verifiable parental consent, we will take steps to delete the information in a manner consistent with applicable laws of India as soon as possible.

5. PURPOSE OF DATA COLLECTION

We collect, organize, structure, store, adapt, or otherwise process your personal data for the following purposes:

- a. **Provision of Services**
 - i. To facilitate the purchase of insurance products, including Life, General, and Health insurance.
 - ii. To process insurance policies and claims efficiently.
 - iii. To provide financial and tax advisory services, wealth management, and related financial products offered by AFAPL and its affiliates and group companies
- b. **Regulatory Compliance and KYC**
 - i. To comply with applicable laws and to fulfil our legal obligations towards our IC Partners.
 - ii. To verify your identity as part of mandatory **KYC procedures**.
- c. **Business Operations**
 - i. To improve and tailor our Services based on your preferences, including customer support, analytics, and audits.
 - ii. To detect and prevent fraud, misuse of our Services, and other unlawful activities.
- d. **Communication and Marketing**
 - i. To send you relevant updates regarding your insurance policies, financial products, and other services we offer or may offer in future.
 - ii. To offer you new services or products that may be of interest to you.

6. YOUR CONSENT

You provide your explicit consent for the collection, processing, and use of your personal data in accordance with this Privacy Policy. This consent includes:

- a. **Collection of Data:** You consent to the collection of your personal data, including personal identification information, financial details, health data, and other relevant information necessary for the provision of our Services
- b. **Use of Data:** You consent to the use of your personal data for purposes such as insurance procurement, financial advisory, claims processing, and regulatory compliance.

7. CONSENT TO SHARING WITH THIRD PARTIES

By providing your personal data to AFAPL, you further consent to the sharing of your data with third parties for legitimate purposes, including

- a. **Insurance Companies:** You consent to sharing of your data with insurance companies for underwriting, policy issuance, claims processing, and risk evaluation.
- b. **Affiliates and Group Companies:** You consent to the transfer of your personal data to our affiliates and group companies to provide insurance or financial services, and to offer products that may be of interest to you.

- c. **Service Providers:** You consent to the sharing of your data with third-party service providers, such as IT vendors, cloud storage, auditors, and consultants, to assist us in delivering Services to you.
- d. **Reinsurers and Risk Consultants:** You consent to sharing of your data with reinsurers and risk consultants for the management and transfer of risks associated with your insurance coverage.
- e. **Regulatory Authorities:** You consent to the disclosure of your data to regulatory authorities, including IRDAI, tax authorities, and law enforcement agencies, as required by applicable laws.

8. KYC-RELATED CONSENTS AND DISCLAIMERS

- a. **Consent to KYC Procedures:** You authorize AFAPL, its group and affiliate companies and third-party service providers to collect, verify, and process your KYC-related information as required under applicable law. This includes identity verification through the following means:
 - i. Aadhaar-based CKYC.
 - ii. PAN-based verification.
 - iii. Verification of other government-issued identification documents.
- b. **Third-Party KYC Agencies:** AFAPL may share your KYC information with authorized agencies like CERSAI, UIDAI, or other identity verification service providers. You consent to the disclosure of your information solely for identity verification and for compliance with statutory requirements.
- c. Failure to provide the required KYC data may result in the inability to offer certain Services or products.

9. DATA RETENTION AND STORAGE POLICY

We retain your personal data for as long as necessary to fulfil the purposes outlined in this Privacy Policy, or as required by applicable laws. Specifically:

- a. **During active services:** Your data is retained while your policies or financial services are ongoing.
- b. **Post-service retention:** Once Services are terminated, we may retain your data for a defined period to comply with regulatory requirements, applicable law, resolve disputes, and enforce contracts.
- c. **Statutory Retention:** Certain information must be retained as required by tax, insurance, and financial regulations as stipulated by applicable law.

Once the retention period expires, we will securely delete or anonymize your data.

All financial information gathered by us shall be stored on servers, log files and any other storage system owned by AFAPL or by third parties authorised by AFAPL in India and such storage will be need-based and to the extent required to render Services.

10. SECURITY OF PERSONAL DATA

We are committed to safeguarding your personal data and have implemented industry standard security measures to protect it against unauthorized access, loss, misuse, or alteration. These measures include:

- a. **Encryption:** Personal data is encrypted both in transit and at rest.
- b. **Access Control:** Only authorized personnel have access to personal data on a "need-to-know" basis.
- c. **Data Breach Protocol:** In case of a data breach, we will take immediate steps to mitigate harm and notify affected parties and authorities as required by applicable law.

We cannot however guarantee that your personal data may not be accessed, disclosed, altered, or destroyed despite any of our security measures and safeguards. In the event of any actual or suspected security incident, including data breach, we will take all measures required to be undertaken under applicable laws. It is further clarified that you have and so long as you access and/or use the Insurance Platform (directly or indirectly) the obligation to ensure that you take adequate physical, managerial, and technical safeguards at your end to preserve the integrity and security of your personal information.

11. YOUR RIGHTS

You have certain rights concerning your personal data:

- a. **Right to Access:** You can request access to your personal data held by us.
- b. **Right to Rectification:** You can request corrections if your data is inaccurate or incomplete.
- c. **Right to Withdraw Consent:** You may withdraw your consent for the processing of your data, though this may limit our ability to provide certain Services.
- d. **Right to Deletion:** You may request the deletion of your personal data, subject to legal and regulatory requirements.
- e. **Right to nominate:** You may nominate, in a manner prescribed by the relevant authorities, any other individual, who shall, in the event of your death or incapacity, exercise your rights in accordance with applicable laws.

To exercise any of these rights, please contact us at the details below.

12. USE OF COOKIES AND TRACKING TECHNOLOGIES

We use cookies, web beacons, and similar tracking technologies to improve user experience, analyze web traffic, and offer tailored content. You may manage cookies through your browser settings. However, disabling cookies may impact your ability to access certain features of our website.

13. DISCLAIMERS

- a. **Accuracy of Data:** While we are responsible under applicable laws in India to ensure completeness, accuracy and consistency of your personal data, we cannot

comply with this obligation without your due co-operation. AFAPL is not responsible for any errors or inaccuracies in the personal data provided by you. You acknowledge and agree that you are solely responsible for ensuring the accuracy, completeness and currentness of your data.

- b. **Third-Party Websites:** Our website may contain links to third-party websites. We are not responsible for the privacy practices, security of your information collected by third parties or content of such websites, and we encourage you to review their privacy policies. Additionally, you may also encounter “cookies” or other similar devices on certain pages of the third party and it is hereby clarified by AFAPL that it does not control the use of cookies by these thirdparty sites. These third-party sites may have their own privacy policies governing the storage and retention of your information that you may be subject to.
- c. **Regulatory Requirements:** AFAPL may be required to disclose your personal data to regulatory authorities, insurers, or financial institutions. Such disclosures are made in compliance with Indian laws and regulations.
- d. **Deceptive Communication:**
 - i. Please be aware that there may be deceptive emails, websites, blogs, and other communications ("**Deceptive Communications**") circulating on the Internet that falsely claim to be affiliated with or associated with our Insurance Platform. These Deceptive Communications may use our logo, images, links, or content and may attempt to mislead you into providing personal information.
 - ii. We want to clarify that the sources and content of these Deceptive Communications are in no way associated with us. For your own safety, we strongly advise you not to respond to any Deceptive Communications without verifying their authenticity.
 - iii. You agree that we shall not be liable for any loss, damage, or harm incurred as a result of your reliance on or actions taken in response to such Deceptive Communications.
 - iv. Except as required for verification purposes as outlined in our Insurance Platform’s Terms, neither we nor our employees will contact you to request your sensitive personal information (SPI).

14. LIMITATION OF LIABILITY

While we strive to protect your personal data using industry-standard security measures, we cannot guarantee absolute security. To the fullest extent permitted by law:

- a. **AFAPL, its affiliates, and its officers, directors, employees, or agents** shall not be liable for any direct, indirect, incidental, special, consequential, or punitive damages arising out of or in connection with the unauthorized access to or misuse of your personal data.
- b. **No Warranties:** AFAPL does not provide any warranties regarding third-party services or their handling of your data. You assume all risks associated with third-party data sharing as outlined in this Privacy Policy.
- c. **Disclosures to Authorities:** AFAPL shall not be responsible for any losses or damages that occur as a result of lawful disclosures to regulatory authorities or other entities mandated by law.

15. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically in response to changing legal, regulatory, or operational requirements. Any changes will be posted on our website with the "Last Updated" date. Your continued use of AFAPL's Services or Insurance Platform will constitute deemed acceptance of this Privacy Policy.

16. GOVERNING LAW AND JURISDICTION

This Privacy Policy is governed by and interpreted in accordance with the laws of India. Any disputes arising from or related to this policy will be subject to the exclusive jurisdiction of the courts in Mumbai, Maharashtra, India.

17. CONTACT US

If you have any questions, concerns, or complaints regarding the Insurance Platform, this Privacy Policy, or wish to exercise any of your rights, please contact us at:

Angel Financial Advisors Private Limited

601, 6th Floor, Ackruti Star, Central Road, MIDC, Andheri (East), Mumbai – 400093, Maharashtra, India

Email: - support.insurance@angelbroking.com

Phone: 1800 1020

We will resolve your concern in an efficient and timely manner, and in a manner compliant with applicable laws in India.