

## Privacy Policy

Effective Date: 1 September 2025

Last Updated: 15 September 2025

Mr. Sumit Bapusaheb Kamblaykar, operating under the professional identity Vardaan Capital, is a SEBI-registered Research Analyst (Registration No. INH000023047). We respect your privacy and are committed to protecting the personal information shared with us.

This Privacy Policy explains how information is collected, used, disclosed, stored, and protected when you access our website, research reports, or services. This policy is framed in accordance with applicable Indian laws, including the SEBI (Research Analysts) Regulations, 2014 and the Digital Personal Data Protection Act, 2023, as amended from time to time.

### 1. Information We Collect

We may collect the following categories of information:

#### 1. a) Personal Information

Name, email address, phone number, and billing details when you register, subscribe, or communicate with us.

#### 2. b) Financial Information

Limited information required to process payments, collected securely through authorized third-party payment gateways. We do not store sensitive payment data on our servers.

#### 3. c) Usage & Technical Information

IP address, browser type, device information, pages visited, and usage patterns when interacting with our website.

#### 4. d) Communication Records

Emails, calls, messages, or other correspondence exchanged with us.

#### 5. Purpose of Data Collection

Information collected is used to:

- Provide research, reports, and educational services
- Communicate service updates and important notices
- Process payments and maintain transaction records
- Improve website functionality and user experience

- Comply with SEBI regulations, legal obligations, and record-keeping requirements

We do not sell, rent, or trade personal data.

### 3. Data Storage & Security

- Information is stored on secure systems with restricted access
- Industry-standard security measures, including encryption and access controls, are used
- Payment processing is handled by regulated third-party gateways

While reasonable safeguards are implemented, no system can guarantee absolute security.

### 4. Disclosure of Information

Information may be disclosed only in the following circumstances:

- Regulatory & Legal Requirements: To SEBI, statutory authorities, or courts when legally required
- Service Providers: To trusted third-party vendors strictly for service delivery
- Legal Protection: To protect rights, safety, or property where required by law

Personal data is not shared for marketing purposes without explicit consent.

### 5. Cookies Policy

Our website may use cookies to enhance functionality, analyze traffic, and improve user experience.

Users may control or disable cookies through browser settings; however, certain features may be affected.

### 6. User Rights

Subject to applicable laws, users have the right to:

- Access personal data held by us
- Request correction or updating of information
- Request deletion of data, subject to SEBI and legal retention requirements
- Opt out of non-essential communications

Requests may be made using the contact details below.

### 7. Data Retention

Personal data is retained only for as long as necessary to:

- Provide services
- Meet SEBI record-keeping requirements
- Comply with applicable laws and audits

#### 8. Third-Party Links

Our website may contain links to external websites. We are not responsible for their privacy practices or content.

#### 9. Privacy Grievance Redressal

For privacy-related queries or grievances, please contact:

Grievance Officer:

Mr. Sumit Bapusaheb Kamblaykar

Email: [support@vardaancapital.com](mailto:support@vardaancapital.com)

Phone: +91-9653360603

If the grievance is not resolved satisfactorily, it may be escalated through SEBI's SCORES 2.0 platform:

<https://scores.sebi.gov.in>

If still unresolved, users may avail the Online Dispute Resolution (ODR) mechanism via the SMART ODR platform as prescribed by SEBI:

<https://smartodr.in>

#### 10. Updates to This Policy

This Privacy Policy may be updated periodically to reflect changes in laws, SEBI regulations, or operational practices. Updated versions will be published on this page.

Sumit Bapusaheb Kamblaykar

*(Professional Identity: Vardaan Capital)*

SEBI Registered Research Analyst

Registration No.: INH000023047