

## **HCLGROUP PRIVACY STATEMENT**

**Effective Date:** 30<sup>th</sup> April, 2025

### **Who are We?**

This privacy policy ("Privacy Policy") explains how & why Vama Sundari Investments (Delhi) Private Limited (an HCL Group Company), or any of its affiliates, associates or subsidiaries ("We", "Us", "Our" "HCL Group") collect, store, use, transfer and share personal information, your rights in relation to your personal information, and how to contact us. This Privacy Policy details the data handling practices for website ([www.hclclimaforcefund.com](http://www.hclclimaforcefund.com)) its corresponding mobile application (collectively "Platforms").

If you do not agree to the collection and processing of your Personal Data, you are free to not provide the Personal Data sought by Us for collection and processing, in such case please do not use, or access the Platforms.

You are advised to carefully read the Privacy Statement before using the Platforms. HCLGroup will not be liable / responsible for any breach of privacy owing to your negligence.

### **What does this Privacy Statement cover?**

This Privacy Statement applies to any personal data, that may be collected directly from you when you interact with Us or from third parties, such as when you:

- Visit our Platforms and other online services including social media pages;
- Send or receive communications from/to us, including emails, phone calls, texts or faxes;
- Use our products and services (for example, as an employee of one of our customers who provided you with access to our products or services) to the extent that We are acting as a controller of your personal data. You should be aware that processing of Personal Data is required for receiving certain products or services, as applicable;
- Access downloadable applications from mobile devices in line with respective privacy statements.
- Register for, attend, or take part in activities such as events, webinars, training, campaigns, or contests;
- Visit our offices; and
- Access, use, or download content from Us (newsletters, whitepapers, reports etc).

This Privacy Statement will be available via link on HCL ClimaForce Fund site and services which it covers. Other HCLGroup websites, apps, or online services may collect and use personal data about you for different purposes and will accordingly publish a separate policy statement/ terms and conditions specific to the processing activity. Our websites and services may contain links to other websites, applications and services not owned by HCLGroup and We do not control the content or privacy practices of those sites. The information practices of other services, or of social media platforms that host our branded social media pages, are governed by their privacy statements, which you should review to better understand their privacy practices.

Our websites and offerings are directed to people in their business or professional capacities. They are not intended for children under 18 years of age. We do not knowingly solicit information online from, or market online to, children under 18 years of age. If you are a parent or guardian and believe your child has provided Us with personal data without your consent, please contact Us as indicated below and We will take steps to delete their personal data from our systems.

### **What personal data do We process?**

For the purposes of this Statement, ‘Personal Data’ means any information about you from which you can be identified, whether derived from that information on its own or when combined with other information, that We or another party may hold about you. This includes:

- Contact information: Your contact information, such as your name, addresses, e-mail addresses, phone number, and other ways in which We may contact you.
- Account/ login information: Your login information, such as your email address, phone number and passwords. You can also sign in through third party accounts (such as your Google or Facebook account). (See ‘Information We collect from other sources’ for details.)
- Profile information: Optional information for your profile, such as your profile picture. Optional information is not necessary for using the Platforms.
- Communications to Us: Your communications to Us, including any feedback, comments, queries, issue reports, or other communications that you send to Us.
- Any other information that you provide to Us with your permissions, consents or preferences.

When you use our Platforms, We collect certain types of Information about how you use or access our Platforms. This includes:

- Usage Data collected and processed about you when you access the Platforms, including but not limited to search queries, products/ songs/music you browse your account settings, times at which you access the Platforms, time spent on certain pages, inferences of your interests and preferences based on your usage.
- Technical data may include data about the devices, software and technology you use such as hardware model, operating system, IP address, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data, mobile network data and web browser details.
- General location data, such as your city, region, or country. This may be understood from technical data such as your IP address, language setting of your device, manual selection of your location, or payment currency.
- We use cookies or other similar technologies to recognise your device, remember you and support the continuity of your experience. Cookies are files which are downloaded to your device when you access our website or web apps.

- Transactional details, such as details about your purchase orders, delivery address and the payments to and from your accounts with us. However, We do not store and do not have access to your financial information such as your bank account numbers, credit/ debit card numbers, or UPI handle.

### **Why do We process your personal data?**

We process your personal data for specified and lawful purposes only and in accordance with the applicable data protection laws.

Your personal data will be processed by HCLGroup for the following purposes:

<b>Legal basis as applicable per the Privacy &amp; Data Protection Laws</b>	<b>Why do We process your data</b>
Legitimate interest	<p>Providing, developing, and improving our products, websites and services and assessing and improving user experience.</p> <p>To prevent fraud or criminal activity and to safeguard the security of our interest including our websites and services.</p> <p>Identifying and assessing customer interest and opportunities.</p> <p>Providing reference materials (whitepapers, vision documents etc.) and managing corporate event registration and attendance.</p> <p>To the extent permitted by applicable laws and regulations, conducting marketing activities, including sending or displaying product and services-related materials, managing user and event registrations.</p> <p>Recording phone and/or video calls and chats for training, quality assurance and administrative purposes.</p> <p>Registering office visitors.</p>
For taking steps at your request prior to entering into a contract and/or for performance of a contract	<p>To provide and deliver our products and services, including managing our licenses, registrations, subscriptions, user access, capacity, billing/payments, support, purchases, etc.</p> <p>To provide you with requested materials, information, when you interact with Us, answer your queries.</p>

	<p>Managing contests or promotions.</p> <p>Managing billing and payments.</p> <p>Managing the relationship established with you.</p>
Compliance with Legal Obligations	To comply with legal obligations to which We are subject, such as keeping records for tax, employment, social security and immigration law purposes, or providing information to a public body or law enforcement or government agencies.
Consent	<p>Subject to local data protection regulations, where consent is required to:</p> <p>Send you marketing communications (unless you have objected to or opted out of such communications);</p> <p>call or send you communications to discuss your products or services or provide you with offers and trials;</p> <p>to customise individuals' online experience and improve the performance, usability and effectiveness of HCLGroup's online presence;</p> <p>collecting and processing information from your mobile device;</p> <p>the processing of personal data that you voluntarily provide for specific purposes</p>

### **How long do We retain your personal data?**

We retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected, or longer if required to fulfil our legal and contractual obligations. After expiration of the retention period, your personal data will be deleted. If We are unable to completely delete the personal data from our systems, We will ensure that there are appropriate measures in place to secure the information and protect it from further use. We store and process your personal data in India. However, We may transfer your personal data to our service providers or partners in other parts of the world.

### **What are your rights and how can you exercise them?**

Depending on your relationship with HCLGroup and in line with local data protection laws, you may have several rights in relation to your Personal Data such as access, rectification, erasure, restriction of

processing, objection, withdrawal of consent, not to be subject to decisions based on automated processing, opt out of marketing communications, etc. Please note, these rights are subject to exemptions and may not apply in all circumstances. If you wish to exercise these rights, HCLGroup will provide you with the requested information or will action your request within stipulated timelines as per applicable privacy and data protection laws, after receipt of your verified request, subject to any extensions that may be required and communicated to you.

You may opt out of marketing communications by clicking on the “unsubscribe” link located at the bottom of all marketing emails, or by replying ‘STOP’ if you receive any SMS communications. Please note that you may continue to receive transactional or other business communications that are associated with our business relationship with you.

### **With whom do We share your personal data?**

HCLGroup is a truly global organisation so your Personal data may be transferred for any of the above stated purposes to different global locations. These transfers will be undertaken in compliance with applicable law(s) and regulation(s).

If it is necessary to transfer your Personal Data from your habitual place of residence to countries that do not offer adequate protections, then We will ensure that appropriate safeguards as required by applicable laws are put in place prior to the transfer of the data.

We may transfer or share your Personal Data with third parties such as our service providers and vendors, business partners, professional and corporate advisors, public or government authorities including law enforcement, network providers, third party websites, and our affiliates or subsidiaries.

When required, HCLGroup may disclose your Personal Data to external law enforcement bodies or regulatory authorities, in order to comply with legal obligations. We may also disclose your personal data where mandated by law and as further required when We believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

If We are involved in a merger, reorganization, dissolution or other fundamental corporate change, We may need to share your information with a third party, in compliance with applicable laws.

### **How do We safeguard your personal data?**

We use a range of security measures to protect your personal data from unauthorized or unlawful access, loss, disclosure, or alteration, including technical, organizational and physical measures.

### **How can you contact Us if you have any questions?**

If you have any questions or concerns about this Privacy Statement or how your Personal Data is processed or if you wish to withdraw your consent, or to request the download or delete your data with Us for any or

all our products & services at any time, please email to [support@hclclimaforcefund.com] from your registered email address.

If you are based in India and you have any grievance or complaint about how your personal data is processed you can contact the Grievance Officer for India at(support@hclclimaforcefund.com) .

### **How will We update this Privacy Statement?**

We may amend this Privacy Statement from time to time. If We materially change our Privacy Statement, We will update the “Effective Date” at the top of the Privacy Statement and We may provide notice prior to the update taking effect by posting a notice on our website or, where required by law, providing you with notice of such updates. We encourage you to visit our sites periodically to stay informed about our privacy practices.