

This policy applies to this website which is operated by Fingeek Digital Pvt. Ltd. (FDPL) under the domain name <https://www.bondvue.com>. We at FDPL understand your concern for the confidentiality and security of information that we may gain about you online. Fingeek Digital is committed to protecting your privacy. This privacy and Terms & Conditions statement explains how your personal information will be treated as you access and interact with the FDPL website. The personal information that we collect may be classified into three parts.

1. Personally Identifiable Information
2. Transaction details
3. System information

**Personally Identifiable Information:** This comprises the information at the time of opening the account or registering online. The information includes the name, address, phone number, email address and other such information as is required from time to time based on regulatory requirements or any other requirement.

**Transaction details:** Information regarding your investments, including balances, positions, and history of transactions available with us.

**System information:** Information about computer hardware and software including information like your IP address, browser type, domain names, access times referring Website addresses etc that may be collected by <https://www.bondvue.com>.

We will protect the Personally Identifiable Information, transaction details and system info with a reasonable degree of care, to prevent unauthorised use, dissemination, or publication of this information as we protect our own confidential information of a like nature.

We would not disclose the personal information to third parties, except under the following circumstances: Under certain circumstances, we may be required to share the information given by you with third parties, where we feel, they can contribute to adding value and improving the quality of services imparted by us to you.

We shall take all reasonable steps to ensure that the confidentiality of your information is maintained by imposing strict confidentiality standards on all the third parties with whom we share this information.

Clients' personal information may be used by FDPL and its Affiliates for the purpose of offering products and/or services that may interest our clients and help to learn about products and/or services that are offered to the public by us and our affiliates.

We may also use personal information to improve our services and to keep our clients updated. We may disclose clients' personal information to companies that provide support services for processing applications and transactions and such disclosure would be limited to the performance of the specific service we have requested.

We may disclose clients' personal information in limited circumstances where disclosures have to be made under the various regulations of Indian Laws or to any governmental agency or regulatory bodies.

We also reserve the right to disclose personal information in limited circumstances where we believe in good faith that disclosure is required under the law, to cooperate with law enforcement authorities, to perform necessary credit checks or collect or report debts owed to us and in all other instances that may be reasonably necessary for us to protect our rights or property.

FDPL will ensure that any party such as an agent or employee to whom it may be necessary to disclose personal information, in turn, respects the confidentiality of such information.

We constantly update our security systems to ensure that any confidential information communicated to us remains safe. We may also ensure that clients' personal information is protected by confidentiality agreements with third parties whenever it is disclosed to them, so as to enable them to provide you certain specified services.

We ensure that the personal information given to us by our clients at the time of filling up the application form will be stored in a safe and secure place. We ensure that the personal information on the web is placed in the secured portion of our website. We use an advanced 128-bit encryption technology, the Secure Socket Layer (SSL), which is one of the best available technologies to ensure that the information transmitted between you and us across the Internet is safe and cannot be accessed by any outsider. SSL has been universally accepted on the World Wide Web for authenticated and encrypted communication between clients and servers.

Whenever clients close their account(s) all records of information will be kept for such a period of time as is required by law and/or any other regulatory bodies. To ensure security of access to personal information and transaction details, access to the secured zone of our website is restricted by the unique Login ID and Password. Clients should be very careful in handling the ID and Password and should ensure not to reveal it to anybody, nor to keep it in writing.

Clients are instructed to keep changing passwords periodically. Our site also alerts you to change your password mandatorily over 14 days. As a matter of precaution, we always give the details of the last login each time clients log on to our site. To ensure the safety of trading access, our technology automatically logs out of the site if no activity is registered for 15 minutes. However, clients are instructed to log in each time before leaving the terminal. This prevents someone else from accessing the account if clients leave their computer and the client's session has not "timed out".

Any personal information in e-mail including email address will be used or disclosed in ways set out in this privacy statement. E-mail message content may be monitored by our internet service provider or FDPL employees for troubleshooting and maintenance purposes or where e-mail abuse is suspected.

FDPL regularly reviews the developments in security and encryption technologies. Unfortunately, no data transmission over the internet can be guaranteed as totally secured. Accordingly, although FDPL strives to protect such information, we cannot ensure or warrant the security of any information transmitted to us and clients do so at their own risk. Once we receive clients' transmission we take reasonable steps to preserve the security of the information in our systems.

For more efficiency, FDPL may join hands with another company to offer or provide products and services, both parties may cross-refer their databases to search for customers in common. This existing information may be used to help identify business alliance opportunities and to enhance the information already contained in the existing databases.

FDPL on its own, or jointly with other organisations and Websites may offer contests, sweepstakes, and promotions. Clients may opt not to participate in these special promotions if they do not want to receive information about contests, sweepstakes & promotions or share their information with all sponsoring parties.

Potential customers applying online for trading accounts can opt out of the application process before completing it. However, we may use the information gathered on the application form during this process to send clients further information about Fingeek Digital services and products we believe may be of interest to you. To enable us to serve you better, the client's personal information available to us must be accurate and updated.

Clients can also send emails to [support@bondvue.com](mailto:support@bondvue.com) and we will ensure that information is updated and protected from any misuse or unauthorised revelation. Clients acknowledge and accept that use of the Fingeek Digital website indicates acceptance of the "Fingeek Digital Website Disclaimer" and the "Privacy and Terms & Conditions Statement".

### **Cookies Policy**

This Cookie Policy describes the information we obtain from Cookies, how we use Cookies, and how Users can manage them. By accessing this Portal, the User acknowledges that the User has read and accepted this Cookie Policy:

#### **Cookies and Log Files**

A cookie is a piece of data stored on the user's computer tied to information about the User. We shall use cookies.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about the User may be linked to the information stored in and obtained from cookies. Users may note that cookies are not strictly necessary for the provision of our Platform and services, we will ask the User to consent to our use of cookies when the User first visits our Platform. Our use of Cookies may involve the processing of Personal Data (i.e., any information relating to an identified or identifiable individual, such as IP addresses, or other online mobile identifiers)

## **Use of Cookies:**

Recognise your browser

Customize the Portal and our Service to suit your interests, needs and preferences

Enable the User to move around the Portal and use its features

Collect information on how users use the Portal and Services.

To store information about your preferences and to personalise our Portal for you

To help us to display advertisements that will be relevant to you.

To analyse - we use cookies to help us to analyse the use and performance of our Portal and Services.

## **Managing cookies**

Our Portal contains links to third-party websites. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party. We do not

exercise control over third-party websites. These other websites may place their cookies or other files on your computer, collect data or solicit Personal Information from you. Other sites follow different rules regarding the use or disclosure of the Personal Information User submitted to them. We are not responsible for the content, privacy and security practices, and policies of third-party sites or services to which links or access are provided through the Service. We encourage users to read the privacy policies or statements of the other websites users visit.

Most browsers allow users to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. Users can however obtain up-to-date information about blocking and deleting cookies via these links:

<https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

<http://www.opera.com/help/tutorials/security/cookies/> (Opera);

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

<https://support.apple.com/kb/PH21411> (Safari); and

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge)

Users have the option to block the cookies by adjusting their browser settings. However, if the cookies are disabled, it will have an impact on your overall experience while using the Portal

FDPL will not be liable if any third party gains access to the cookies from your computer, phone, tablet or any other internet-enabled device.

Changes to this Cookies Policy

We may periodically update this Cookie Policy without prior notice to reflect changes in our practices. Any such changes will be posted on this page.

### **Data Protection via Blockchain Security :**

Immutability and Decentralization:

Blockchain technologies are designed to be immutable, decentralised, and distributed ledgers. This means that once data is recorded on the blockchain, it cannot be altered or tampered with. The consensus layer ensures that valid data is distributed across nodes in the decentralised network, enhancing transparency and security.

### **Smart Contract Business Logic:**

In traditional digital applications, compromising either the business logic on servers or the stored data in databases can compromise the entire application. With smart contracts, we encode the business logic directly on the blockchain. Even if a data entry is deleted from the smart contract, the event is recorded in the immutable ledger, ensuring the perpetual existence of data.

### **Polygon Network and zkWASM:**

Our application leverages the Polygon network, a Layer 2 blockchain known for its speed, cost-effectiveness, and security. Polygon incorporates zkWASM technology, combining the efficiency of WebAssembly with the privacy and security features of zero-knowledge proofs. This enhances scalability, improves privacy, and strengthens overall security.

### **RBAC and Wallet Roles:**

Using Role-Based Access Control (RBAC), every blockchain wallet associated with FDPL is assigned specific roles. These roles govern permissions at the smart contract level, protecting against unauthorised access from external wallets.

### **Immutable Transactions:**

Every transaction stored in the blockchain is immutable, meaning it cannot be changed once recorded. Data available through smart contracts can only be modified using specific methods outlined in the smart contracts, ensuring a secure and tamper-resistant record of transactions.

## **No Storage of Sensitive User Information:**

We prioritise user privacy and security by not storing sensitive information in the blockchain. Instead, only anonymous wallets associated with demat accounts are stored. These wallet details remain confidential within the Ethereum Virtual Machine (EVM) ecosystem, accessible only to FDPL administrators.

## **2. Your Choices:**

### **2.1 Account Information:**

Users maintain control over their account information. By accessing account settings, you have the option to review and update your personal details, ensuring transparency and giving you the ability to manage your information on the FDPL platform.

## **3. Information We Collect:**

### **a. Personal Information:**

#### **User Registration Information:**

We gather information provided by users during the registration process. This includes your name, contact details, and necessary identification documents. This data is essential for creating and managing your account on the FDPL platform.

#### **Financial Information for Bond Transactions:**

In the course of bond transactions facilitated through FDPL, we collect financial information relevant to these transactions. This may include details such as the amount, type, and timing of bond transactions.

#### **Additional Voluntary Information:**

Users have the option to voluntarily provide any extra information they deem relevant. This could enhance their profile on the platform and contribute to a more personalised experience.

### **b. Blockchain Information:**

#### **RBAC Smart Contracts:**

Secure Role-Based Access Control (RBAC) smart contracts have been developed to record all trading activities conducted through the FDPL platform. This ensures a transparent and secure record of transactions. To provide proof of bond holdings in user Demat accounts, we maintain an equivalent amount of tokens in the wallet. This ensures a direct correlation between the tokens and the actual bond quantity traded via the FDPL portal by a specific Demat account.

## **Blockchain Wallets for Demat Accounts:**

Upon user registration, a unique blockchain wallet is created for each Demat account managed by FDPL. These wallets serve as secure digital repositories for managing bond-related assets.

## **Tokenisation of Registered Bonds:**

All bonds registered on the National Stock Exchange (NSE) and Bombay Stock Exchange (BSE) are tokenised. Tokenisation involves representing these bonds as digital tokens on the blockchain, enabling efficient and secure trading.

## **Proof of Bond Holdings through Tokens:**

### **4. How We Use Your Information:**

#### **a. Operational Purposes:**

##### **Provide Customer Support and Respond to Inquiries:**

We use your information to offer customer support services and promptly address any inquiries or concerns you may have. This involves using your details to communicate with you effectively and provide assistance throughout your interaction with the FDPL platform.

#### **b. Legal Compliance:**

##### **Comply with Legal Obligations and Regulatory Requirements:**

To adhere to applicable laws and regulations, we use your information as required by legal authorities and regulatory bodies. This includes fulfilling reporting obligations, verifying user identities, and ensuring overall compliance with the legal framework governing financial transactions and data protection.

##### **Prevent Fraudulent Activities and Ensure the Security of the Platform:**

Your information is utilized to identify and prevent fraudulent activities on the FDPL platform. This involves employing security measures to safeguard against unauthorized access, fraudulent transactions, and other malicious activities. By analyzing user data, we can detect anomalies and take appropriate measures to maintain the integrity and security of the platform.

## **Changes To The Privacy Policy**

From time to time, we may update this Privacy Policy to reflect changes to our information practices. Any changes will be effective immediately upon the posting of the revised Privacy Policy. If we make any material changes, we may notify you by email (sent to the e-mail address specified in your account) or by means of a notice on the Website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Grievance Redressal**

If you have any questions or concerns about this Privacy Policy, please feel free to contact us by writing to us at [contact-us](#) - or using the details provided on our 'Contact Us' page. We will use reasonable efforts to respond promptly to requests, questions, or concerns you may have regarding our use of personal information about you. Except where required by law, the Company cannot ensure a response to questions or comments regarding topics unrelated to this policy or Company's privacy practices

Alternately, you can reach out to our grievance redressal officer in charge:

Name: Aman Sharma

Designation: Compliance Officer

Contact Email: [support@bondvue.com](mailto:support@bondvue.com)

FDPL may, at any time, vary the privacy and security statement by publishing the varied privacy and security statement on the Fingeek Digital Website.