Privacy Policy

G.A.Capital Management Pvt Ltd(GACM) ("us", "we", or "our") operates the gacap..com

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you. Types of Data Collected:

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally, identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- · Address, State, Province, ZIP/Postal code, City
- · Cookies and Usage Data

Usage Data

We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, this Usage Data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

• Session Cookies. We use Session Cookies to operate our Service.

• Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

• Security Cookies. We use Security Cookies for security purposes.

Data Protection Officer

To communicate with our Data Protection Officer, please email <u>compliance@gacap.com</u>

The Data Controller and Processor

Data protection law in certain jurisdictions differentiates between the "controller" and "processor" of information. In general, Customer is the controller of Customer Data. In general, GACM is the processor of Customer Data and the controller of Other Information.

Your Rights

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information. You can usually do this using the settings and tools provided in your Services account. If you cannot use the settings and tools, contact Customer Support for additional access and assistance.

To the extent that GACM's processing of your Personal Data is subject to the General Data Protection Regulation, GACM relies on its legitimate interests, described above, to process your data. GACM may also process Other Information that constitutes your Personal Data for direct marketing purposes and you have a right to object to GACM's use of your Personal Data for this purpose at any time. Direct marketing purposes (or activity) are usually meant for accounts, where user wants free services.

GACM may use automated decision making in processing your personal information for some Services. You can request a manual review of the accuracy of an automated decision at any time.

You have the following rights:

- 1. The right to be informed; This means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
- 2. The right of access; this is your right to see what data is held about you by a Data Controller.
- 3. The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.
- 4. The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
- 5. The right to restrict processing; this gives you the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
- 6. The right to data portability; you have the right to ask for any data supplied directly to the Data Controller, to be provided in a structured, commonly used, and machine-readable format.
- 7. The right to object; you have the right to object to further processing of your data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
- 8. Rights in relation to automated decision making and profiling; You have the right not to be subject to a decision based solely on automated processing.

Use of Data

GACM uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

DND Subscribers

By submitting the forms on our website, the user consents to being reached out through email, whatsapp or phone calls. This remains true for the DND subscribers as well.

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other

governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside India and choose to provide information to us, please note that we transfer the data, including Personal Data, to India and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

GACM will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

Legal Requirements: GACM may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of GACM
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Security of Data

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics: We may use third-party Service Providers to monitor and analyse the use of our Service.

Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us, by email at <u>compliance@gacap.com</u>