

1. Introduction

This Personal Data Protection Policy (“**Policy**”) sets out the policy and practice of Mizuho Securities India Private Limited (referred to in this Policy as “**MHSI**”, “us”, “we” or “our”) regarding its collection, use, management, disclosure and protection of personal information. In this Policy, “**Mizuho Group**” means MHSI and any entity directly or indirectly controlled by MHSI, any entity that directly or indirectly controls MHSI or any entity directly or indirectly under common control with MHSI. MHSI considers appropriate protection and use of personal information to be an important regulatory and social responsibility, and makes every effort to appropriately protect and use personal information when conducting business, by complying with the Information Technology Act, 2000 as amended from time to time along with rules made thereunder, other related laws and regulations, and the internal rules of MHSI including this Policy.

This Policy applies to the personal data of any individuals that MHSI may deal with, including clients, customers, employees, business contacts, vendors, partners, contractors and other individuals.

By entering into any agreements with us, interacting with us, submitting information to us or applying for products or services offered by us, you agree and consent to MHSI (including its related corporations and business units) as well as our respective agents, authorized service providers and relevant third parties collecting, using and disclosing your personal data in accordance with this Policy.

This Policy supplements but does not supersede nor replace any other consents which you may have previously provided to MHSI in respect of your personal data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your personal data.

For the avoidance of doubt, this Policy forms a part of the terms and conditions governing your relationship with us and should be read in conjunction with those terms and conditions.

2. Personal Data or Personal Information

Personal data or Personal Information means any information that relates to a natural person, which either directly or indirectly, in connection with other information available or likely to be available with MHSI, is capable of identifying such person.

Examples of personal data that MHSI may collect include (depending on the nature of our relationship with you):

- (a) personal particulars (e.g. name, passport or other identification number, date of birth, telephone numbers, residential address, email address);
- (b) financial details (e.g. income, expenses, assets, credit history) and banking information (e.g. account numbers and balances, banking transactions);
- (c) education and employment details (e.g. resume, qualifications, certifications, training history, occupation, employment history, salary, benefits, employment references);
- (d) specimen signatures;
- (e) tax and insurance information; and
- (f) other personal data that MHSI thinks is relevant to your relationship with us

Sensitive Personal Data or Information of a person means such personal information which consists of information relating to:-

- (a) password
- (b) financial information such as Bank account or credit card or debit card or other payment instrument details;
- (c) physical, physiological and mental health condition
- (d) sexual orientation
- (e) medical records and history
- (f) biometric information
- (g) any detail relating to the above clauses as provided to body corporate for providing service; and
- (h) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise.

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information.

3. Collection of Personal Data

Generally, MHSI may collect personal data in the following ways:

- (a) when you submit application forms, questionnaires or other forms to us;
- (b) when you submit queries, requests, complaints or feedback to us;
- (c) when you use or sign up to any of MHSI' services;
- (d) when you interact with our staff, which may include customer service officers, relationship managers and other representatives, through telephone calls, letters, meetings and email;
- (e) when your images are captured by us in the form of photographs or videos, including via our CCTV cameras while you are on our premises or when you attend our events;
- (f) when you request that we contact you, and when you respond to our marketing representatives, agents and other service providers;
- (g) when you respond to our requests for additional personal data;
- (h) when you request to be included in an email or other mailing list;
- (i) when you submit a job application;
- (j) when we receive your personal data from business partners, public agencies, your employer or previous employer and other third parties in connection with your relationship with us; and
- (k) when you submit your personal data to us for any other reasons.

If you provide us with any personal data relating to a third party, by submitting such information to us, you represent to us that you have obtained the consent of that third party for providing us with their personal data for the purposes set out in this Policy.

4. Purposes for the Collection, Use and Disclosure of Personal Data

Generally, MHSI collects, uses and discloses your personal data for the following purposes:

- (a) verifying your identity, including new or existing client verification;
- (b) verifying information supplied to MHSI by you or your authorised representatives;
- (c) responding to, handling, and processing queries, requests, applications, instructions, complaints and feedback from you;
- (d) managing your relationship with us;
- (e) developing and providing financial services or related products;
- (f) marketing (including direct marketing) of financial services or related products;
- (g) performing obligations in the course of or in connection with our relationship or our provision of the services requested by you;
- (h) providing a contact person to MHSI customers for operational matters with information concerning the Mizuho Group's businesses as well as information concerning any investment opportunities;
- (i) transfer of such data to any place inside or outside India whether for the processing, holding or use of such data inside or outside India for one or more of the purposes set out herein;
- (j) matching any personal data which relates to you for any of the purposes set out herein;
- (k) data verification or exchange;
- (l) facilitating business transactions;
- (m) managing the administrative and business operations of MHSI and complying with internal policies and procedures;
- (n) financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes;
- (o) if you are a job applicant or employee, assessing and evaluating your suitability for employment in any current or prospective position within the organization;
- (p) if you are an employee, performing obligations under or in connection with your contract of employment with us, including administrative and human resources related matters,
- (q) seeking professional advice, including legal advice;
- (r) complying with any applicable laws, regulations, codes of practice, guidelines, or rules applicable to the Mizuho Group, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- (s) enabling any of the actual or proposed transferees or assignees of MHSI's rights in respect of its customers to evaluate the transaction intended to be the subject of the transfer or assignment;
- (t) in connection with any system or facility for payment or communication by electronic means which MHSI or any other Mizuho Group company participates; and
- (u) any other purpose relating to or in connection with the any of the above, any business or dealings of the Mizuho Group or for any purpose which MHSI and you may from time to time agree.

5. Disclosure of Personal Data

Your personal data held by us shall be kept confidential. However, in order to provide you with effective and continuous products and services, and for the purposes listed above (where applicable), your personal data may be disclosed to the following parties as MHSI may consider necessary, whether located in India or elsewhere:

- (a) any entity within the Mizuho Group, including its branches and offices;
- (b) any director, officer, employee or representative of the Mizuho Group only when carrying out the business of the Mizuho Group;
- (c) any agents, contractors, consultants or third party service providers who provide services to any Mizuho Group company in connection with our businesses, including courier services, employment, administrative, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, or other services;
- (d) any person who owes a duty of confidentiality to the Mizuho Group or who has undertaken to keep such information confidential;
- (e) any financial institutions (including brokers) with which MHSI customers have or propose to have dealings relevant to the nature of business;
- (f) where data is collected by a Mizuho Group company as agent of any other person or for forwarding to or otherwise for the purpose of making any application or request to any other person for any facility or service, to such other person, noting that any such person who may not be in India, may not be subject to the Indian Regulation and accordingly the data is not protected to the same extent as under the Indian Regulation;
- (g) any business partner or investor to facilitate business transactions;
- (h) our professional advisors, such as financial advisors, auditors and lawyers;
- (i) vendors and other third party service providers in connection with promotions, online campaigns, products and services offered by MHSI;
- (j) relevant regulatory bodies, government agencies, statutory boards, administrative bodies, authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations to which the Mizuho Group may be subject, whether situated locally or overseas;
- (k) any person to whom MHSI transfers or assigns or, proposes to transfer or assign, MHSI' interests and/or obligations in respect of MHSI customers, including any accounts or any services;
- (l) any other party to whom disclosure of personal data is reasonably necessary for the purpose of managing, maintaining or terminating our relationship with you, or providing you with our services; and
- (m) other third parties: (1) as are necessary for the services provided by MHSI from time to time; (2) where required by rule or law or order or request from any governmental or regulatory body; (3) where the information is already publicly available (otherwise than as a result of a breach of our obligations hereunder); or (4) where requested or permitted by you.

6. Accuracy and Updates to Personal Data

We shall make a reasonable effort to ensure that the personal data collected from you is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organization. If there is any change in your personal data, you should inform us as soon as possible.

7. Protection of Personal Data

To safeguard your personal data, we have put in place reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. In the event that we transfer your personal data to a country outside India, we shall take all reasonable steps to ensure that it is provided a comparable standard of protection.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

8. Continuous Improvement and Changes

MHSI may revise this Policy from time to time without any prior notice to ensure that this Policy is consistent with future developments, industry trends and any changes in laws or regulations. Subject to your rights at law, you agree to be bound by the prevailing terms of the Policy as updated from time to time and as provided to you.

9. Access to and Correction of Personal Data

If you wish to make (a) a request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data; or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Compliance Officer at the contact details provided below.

We will provide you with access to the personal data where it is permitted to do so under the applicable laws and regulations. Where we are permitted to provide you with a copy of the personal data requested, please note that a reasonable fee may be charged for processing such a request. If so, we will inform you of the fee before processing your request.

10. Retention of Personal Data

We may retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected, or as required or permitted by applicable laws. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data were collected, and is no longer necessary for legal, regulatory or business purposes.

11. Roles and Responsibilities of Compliance Officer

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. If you would like to apply for access to or correction of your personal data, or withdraw consent to the use of your personal data, you may contact our Compliance Officer at the contact details set out below. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our services to you or administer any contractual relationship with you, and we shall, in such circumstances, notify you before completing the processing of your request.

Please contact our Compliance Officer by telephone, email or by sending a letter, for any comments or inquiries you may have:

Compliance Officer
Legal and Compliance Department
Phone: +91 22 4353 7600
E-mail: AS_IN_LnC@mizuho-sc.com

Address: Level 17, Tower A, Peninsula Business Park, Senapati Bapat Marg, Lower Parel, Mumbai – 400 013, India

12. Data Protection for Japanese Residents

MHSI is a group company of Mizuho Financial Group, Inc. (“**MHFG**”) which also recognizes appropriate protection and use of personal information to be important social responsibilities, and makes every effort to appropriately protect and use personal information complying with laws and regulations including the Act on the Protection of Personal Information (“**APPI**”). The APPI has an extraterritorial application so long as the individual resides in Japan. MHFG’s privacy policy shall apply to such individuals and can be found at the following URLs:

For Japanese version: <https://www.mizuho-fg.co.jp/privacy/customer/index.html>

For English version: <https://www.mizuhogroup.com/privacy>

13. Data Protection for Persons Resident in the European Economic Area

With effect from 25 May 2018, the European Union General Data Protection Regulation (“**GDPR**”) will come into force. The GDPR applies to organizations located within the European Economic Area (“**EEA**”), as well as to organizations located outside the EEA where they offer services to persons resident in the EEA. It applies to all companies processing and holding the personal data of persons resident in the EEA, regardless of the company’s location.

Where MHSI will be offering services to persons resident in the EEA or processing and holding the personal data of persons resident in the EU, it will need to comply with GDPR.

If you are a person resident in the EEA who will be providing personal data to MHSI, this Section and the Privacy Notice in Appendix 1 will apply to you.

Personal Data

In the context of GDPR, “personal data” means any information relating to an identified or identifiable natural person (“**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier (“**Personal Data**”) including, but not limited to:

- A Name (First Name, Last Name, Alias);
- An identification number (including but not limited to, passport number, employee number or driving license number);
- An online identifier;
- Location data (home or work addresses);
- Contact information (telephone numbers, email addresses);
- Photographs and biometric data;
- One or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, and includes:

- collection;
- recording;
- organization;
- structuring;

- storage;
- adaptation or alteration;
- retrieval;
- consultation;
- use;
- disclosure by transmission;
- dissemination or otherwise making available;
- alignment or combination;
- restriction; or
- erasure or destruction.

Processing of Personal Data

MHSI processes Personal Data to facilitate the delivering of products and services to its clients, to efficiently and effectively manage its business, as part of its legal and regulatory obligations and/or in connection with the employment of its staff.

Processing of Personal Data by MHSI is permitted under the GDPR for the following applicable purposes:

- a) The data subject has given consent to the processing of his or her Personal Data for one or more specific purposes.
- b) It is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- c) For compliance with a legal obligation to which the organization is subject.
- d) To protect the vital interests of the data subject or of another natural person.
- e) For the purposes of the legitimate interests pursued by MHSI or by a third party, except where such interests are overridden by the interests or fundamental rights and freedom of the data subject which require the protection of Personal Data.

MHSI' processing of Personal Data will be in accordance with the purposes stipulated in sections b) to e) above. In the event that a situation arises whereby consent is required from the data subject for processing of Personal Data, MHSI will need to obtain explicit consent from the data subject, upon informing the data subject of the specific purpose.

Privacy Notice

Please read the Privacy Notice in **Appendix 1** of this Policy. The Privacy Notice sets out the types of Personal Data collected from you, the purposes of processing the Personal Data, possible third party recipients of Personal Data and transfers of Personal Data to a third country, technical and organizational security measures, retention time and the rights of data subjects as well as contact details of the Compliance Officer.

1 Introduction

1.1 Definitions, Acronyms and Abbreviations

The following acronyms and abbreviations are used throughout this Privacy Notice.

Affiliate	An entity owned by the Mizuho Financial Group, Inc.
MHSI	Mizuho Securities India Private Limited
Personal Data	Any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier including, but not limited to: <ul style="list-style-type: none"> • A Name (First Name, Last Name, Alias); • An identification number (including, but not limited to, Passport number, Employee Number or Driving License Number); • An online identifier; • Location data (home or work addresses); • Contact information (telephone numbers, email addresses); • Photographs and biometric data; • one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Staff	Refers to employees, temporary workers, contractors and 3 rd party consultants.

1.2 Application

Depending on the nature of relationship which MHSI has with the data subject, MHSI is a data controller or processor in respect of your Personal Data. On this basis, MHSI is responsible for ensuring that it uses your personal data in compliance with applicable data protection law.

This Privacy Notice applies if MHSI processes Personal Data of contractors, market participants and clients. The Privacy Notice sets out the basis on which any Personal Data about you that you provide to MHSI, that MHSI creates, or that MHSI obtains about you from other sources, will be processed by MHSI. Please take the time to read and understand this Privacy Notice.

1.3 Types of Personal Data collected

MHSI collects and processes the following Personal Data about you:

- Contact details (including address, telephone numbers, email addresses);
- Individuals’ names;
- Personal identifiers (including tax codes, national identification references, National Insurance numbers, bank account details and passport numbers);
- Photographs;
- Information about our business relationship with you;
- Professional information (including job title, role, department)
- Communication preferences (including preferred language)
- Vendor contact and sub-contractor details;

- Data subject details associated with the author or modifier of electronic records.

1.4 Purpose of Processing the Personal Data

Your Personal Data may be stored and processed by MHSI in the following ways and for the following purposes:

- Allowing MHSI to provide services to you;
- Backup retention and management supporting business continuity;
- Contacting you as part of the conduct of normal business;
- Providing an audit trail relating to the conduct of normal business; and
- For operation and maintenance purposes, IT applications and infrastructure.

MHSI is entitled to use your Personal Data in these ways because:

- the performance of MHSI' obligations under its contract with you (otherwise MHSI may not be able to fulfil its obligations and provide services to you);
- MHSI has legal and regulatory obligations that it has to discharge;
- MHSI may need to in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings; or
- the use of your Personal Data as described is necessary for MHSI's legitimate business interests (or the legitimate interests of one or more of MHSI' affiliates), such as:

- Accounting;
- Administration of employee benefits;
- Book Maintenance;
- Business Continuity Planning;
- Change Management;
- Collateral Management and Treasury operations;
- Communications (telephones, intranet, internet, emails);
- Compliance checks and conflict monitoring;
- Data Management and Governance;
- Enterprise Collaboration and Mobility
- Accounts Payable processing;
- Fraud prevention;
- Health and Safety management;
- Information Security management and administration;
- IT controls;
- IT Disaster Recovery and BCP Plan Management;
- Legal management;
- Mobile device management and service provision;
- Payroll processing;
- Provision of employee medical and life insurance;
- Purchasing and procurement;
- Recruitment and Human Resource administration;

- Regulatory monitoring and administration;
- Regulatory reporting;
- Risk Management;
- Risk Management and Reporting;
- Sales and Trading and Order Management;
- Sales Credit and Commission Management Reporting;
- Sanctions, KYC and AML screening;
- Staff record keeping;
- Staff training;
- Trade Affirmation and Clearing;
- Travel and Entertainment;
- Travel Bookings;
- User access verification;

1.5 Third party recipients of personal data

MHSI may disclose your Personal Data to its affiliates. MHSI will take steps to ensure that the Personal Data is accessed only by staff of such affiliates that have a need to do so for the purposes described in this Privacy Notice.

MHSI may also share your Personal Data outside of MHSI and its affiliates:

- to MHSI vendors and market participants;
- if MHSI sells any of its business or assets, in which case MHSI may disclose your Personal Data to the prospective buyer for due diligence purposes;
- if MHSI is acquired by a third party, in which case Personal Data held by MHSI about you will be disclosed to the third party buyer;
- to third party agents or contractors for the purposes of providing services to MHSI. These third parties will be subject to confidentiality requirements and they will only use your Personal Data as described in this Privacy Notice; and
- to the extent required by law, for example if MHSI is under a duty to disclose your Personal Data in order to comply with any legal obligation, establish, exercise or defend its legal rights.

1.5.1 Transfer of personal data to a third country

Given that MHSI is located in India, the Personal Data that MHSI collects from you will be stored at a destination outside the European Economic Area (“**EEA**”). It will also be processed by staff operating outside of the EEA who works for MHSI and its affiliates or for one of MHSI’s suppliers.

MHSI will ensure that the Personal Data is protected in a manner that is consistent with how your Personal Data will be protected by MHSI or its affiliates in the EEA. This can be done in a number of ways, for instance:

- the country that MHSI sends your Personal Data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your Personal Data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit MHSI to otherwise transfer your Personal Data outside the EEA.

In all cases, however, MHSI will ensure that any transfer of your Personal Data is compliant with data protection law.

You can obtain more details of the protection given to your Personal Data when it is transferred outside the EEA (including a copy of the relevant safeguards) by contacting MHSI as set out in section 1.7.

1.5.2 Technical and organisational security measures

MHSI ensures that suitable contractual arrangements are in place with third parties such that safeguards equivalent to MHSI' are in place for the processing of your Personal Data.

1.5.3 Retention time

Personal Data is kept for the time necessary to provide the services to you or to fulfil legal, contractual or ongoing business interests. Once the purpose for processing the Personal Data has been discharged, MHSI shall keep such Personal Data no longer than is necessary, subject to any laws or regulations that may set a minimum period for which MHSI has to keep your Personal Data.

1.6 The Rights of Data Subjects

Subject to applicable exemptions, you have the right, at any time,:

- to obtain information regarding the processing of your Personal Data and access to the Personal Data which MHSI holds about you;
- where it was on the basis of MHSI processing your Personal Data, to withdraw your consent to MHSI processing your Personal Data at any time;
- to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that MHSI transmits those data to a third party where this is technically feasible;
- to request that MHSI rectifies your Personal Data if it is inaccurate or incomplete;
- to request that MHSI erase your Personal Data;
- to object to, and the right to request that MHSI restricts its processing of your Personal Data; and
- to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by MHSI.

You can exercise these rights by contacting MHSI as detailed in section 1.7. Upon request, MHSI will provide a copy of the Personal Data. Subsequent to the first request, where you request that MHSI provides you with further copies of the Personal Data, we may charge a reasonable fee based on administrative costs. We will inform you of the fee, if any, prior to processing your request. You can find out more information about your rights by contacting the Information Commissioner's Office, or by searching their website at <https://ico.org.uk/>.

1.7 Contact

If you would like further information on the collection, use, disclosure, transfer or processing of your Personal Data or the exercise of any of the rights listed above, please address questions, comments and requests to:

Compliance Officer
Legal and Compliance Department
Level 17, Tower A, Peninsula Business Park, Senapati Bapat Marg, Lower Parel,
Mumbai – 400 013, India

Phone: +91 22 4353 7600
E-mail: AS_IN_LnC@mizuho-sc.com

1.8 Changes to this Privacy Notice

MHSI reserves the right to make written changes to this Privacy Notice at any time. If MHSI makes any changes, it will notify you.