

Policy on Privacy & Security of Information

We, respect Users right to privacy and take it very seriously. Please read this privacy policy very carefully as it contains information on who we are and how and why we collect, store, use and share your Personal Information.

It is our endeavor to ensure that your personal data that we collect, process, record or use in any way whether it is held on paper, on computer or other electronic media will have appropriate safeguards in place to comply with our obligations of confidentiality and privacy.

A. Interpretation

- a. All references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa. All references to client/customer/investor whether masculine or feminine include references to non-individuals also unless repugnant to the context thereof;
- b. Any reference to any statute or statutory provision shall be construed as including a reference to any statutory modifications or re-enactment therein from time to time;
- c. Headings are for ease of reference only.

B. Key Terms

1. "We" shall mean WhiteOak Capital Asset Management Limited (herein above and after referred to as the "AMC", having its office at Cnergy, B2/B3, 6th Floor, Appasaheb Marathe Marg, Prabhadevi, Mumbai, Maharashtra 400025.AMC is incorporated and registered in the form of a company under the provisions of the Companies Act, 2013, has been appointed as the InvestmentManager to the Schemes of WhiteOak Capital Mutual Fund ('WOCMF' or 'Mutual Fund'). WhiteOak Capital Trustee Limited is the Trustee to the Mutual Fund.
2. "Personal Information" shall mean as defined under The Information Technology Act, 2000, Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011" and such other rules/regulations/notifications and Circulars by the regulator/judiciary/quasi-judicial body/government as applicable, and as amended thereof.
3. "User(s)" shall mean investors, customer, clients.
4. "RTA" shall mean Registrar and Transfer agent. Computer Age Management Services (CAMS) is acting as RTA to the schemes of Mutual Fund.
5. "Service Providers" shall mean any third party, including RTA engaged by the AMC/Mutual Fund to provide services its current and prospect Users.
6. "PMLA" shall mean Prevention of Money Laundering Act, 2002, including, the

rules issued thereunder, and guidelines and circular on Anti- Money Laundering issued by the SEBI.

C. Privacy Notice

This Policy shall be available on the AMC's website viz. mf.whiteoakamc.com for the Users reference. The AMC reserves the right to amend/modify any of the sections of this policy at any time and same amended Policy shall be applicable to the Users. Users are requested to keep themselves updated.

D. Users Choice and Consent

By choosing to use and by using the AMC's website and its services, the User agrees to the AMC's /the Mutual Fund's collection, use and sharing of the User's Personal Information as described in this policy.

E. Security Controls for Private Data

The AMC adopts reasonable security practices and procedures and will protect the Users' Personal Information by reasonable security safeguards appropriate to the sensitivity of the Personal Information, consistent with generally accepted standards of commercial business practice, which includes, technical, operational, managerial and physical security controls and that are commensurate with the nature of business at all times in order to protect the Users' Personal Information from unauthorized access, or disclosure while it is under the AMC's / the Mutual Fund's control.

The AMC takes appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of the AMC's/ the Mutual Fund's data collection, storage and processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where the AMC/ the Mutual Fund stores Personal Information. Further, the AMC permits only authorized employees who are trained in the proper handling of customer information, to have access to aforesaid information. The employees who violate the privacy and confidentiality promise shall be subjected to disciplinary action. All information gathered by the AMC/ the Mutual Fund is securely stored within the AMC's and/or Service Providers controlled databases.

The databases are stored on servers firewall secured; access to the servers is password-protected and is strictly limited. However, as effective as the AMC's security measures are, no security system is impenetrable. If any User knows or has reason to believe that the Users' account credentials have been lost, stolen, altered, or otherwise compromised or in case of any actual or suspected unauthorized use of the Users' account, the User is requested to please contact the AMC/ the Mutual Fund by contacting the AMC's Client Services.

The User understands and agrees that the AMC/ the Mutual Fund uses Service

Providers to act on the AMC's/the Mutual Fund's behalf for performing functions such as processing transactions, issuing account statements, payment gateway services, customer services etc. The AMC would ensure to enter into suitable terms with its service providers in order to protect User confidentiality and follow a non-disclosure or restricted disclosure policy.

Any account statement containing financial information pertaining to the investor, if it is to be sent over the internet to such investor, distributors or any other entity as indicated above will be sent only through a secure means and/or through encrypted electronic mail.

The User may download materials, data etc. displayed on the AMC's website for non-commercial and/or personal use only. The User may not, however, distribute, modify, transmit, reuse, report, or use the contents of the website for public or commercial purposes, including the text, images, audio and video without the AMC's prior written permission.

The User shall not delete, modify and/or otherwise interfere with copyright or other Intellectual Property rights displayed on the AMC's website.

F. Data Collection

The AMC either directly or through its Service Providers collects, receives, possesses, stores, deals or handles information received from the Users whether existing or prospect. We may collect following Personal Information about you:

- a. your name and contact information, including email address and telephone number
- b. Information to enable us to check and verify your identity, e.g. your date of birth
- c. Bank Account details, change of bank account details or registration of multiple bank accounts etc. through paper based or online application forms;
- d. Payment instrument details; at the time of submitting application at the time of investment or as proof for carrying out change of bank account or any other details (if any);
- e. Generation and storing password (PIN) in encrypted form based on the request from the investor under the online mode of investments;
- f. Biometric information obtained, if any;
- g. Demat Account details like beneficiary account no. etc.;
- h. Annual Income and savings profile; and
- i. Other information as may be considered as sensitive and personal.

The aforesaid information is being collected by the AMC/Service Providers- in person, by telephone, text, email, or via our website or app or Service Providers website or app, to process Users investment applications request and to also ensure safe subscriptions/redemptions through points of acceptance in physical form, website, online portals, Automated Teller Machines and such other mode. The AMC may also call the investors to inform them with respect to the other products or services offered

by the AMC. The said information(i.e. point a to i above) is also being collected to be compliant with the Know Your Client (KYC) norms under the, PMLA.

The aforesaid information is the basis of our ability to provide investors/clients/customers with good, qualitative, timely and efficient service, while also keeping the information and data provided totally secure and confidential.

The User supplies the AMC/ the Mutual Fund with e-mail address on-line then the User may receive periodic messages from the AMC/ the Mutual Fund with information on new products and services or upcoming events. If the User supplies the AMC/ the Mutual Fund with postal address on-line then the User may receive periodic mailings from the AMC/ the Mutual Fund with information on new products and services or upcoming events. If the User supplies the AMC/ the Mutual Fund with telephonenumber on-line then the User may receive telephone calls from the AMC/ the Mutual Fund with information regarding products or services, the User has asked about on-line. The User also may receive telephone calls from the AMC/ the Mutual Fund with information regarding new products and services or upcoming events.

The AMC / the Mutual Fund makes no representations of any kind whatsoever about the content of any such web site that the User may access through the AMC's/ the Mutual Fund's website. The User is advised to read the terms and conditions/disclaimers of such website that may be accessed by the User. The AMC also advises the User to confirm the accuracy of any such information before seeking to rely on such information. The AMC disclaims all liability that the User may incur as a result of relying on any such reports/information and/or accessing any other website and/or any third-party content that may be accessed from the website

G. User Data Collected on the AMC's Website and Access to Data

The information the User requests from the AMC's / the Mutual Fund's website for the User's accounts can only be accessed with the User's password and the OTP generated and sent to user on his registered e-mail id and mobile number. It is the User's responsibility to keep the password confidential and not allow access to his e-mails and mobile to others to prevent unauthorized access. The User should not disclose the password to anyone. The employees and associates of the AMC/ the Mutual Fund will never ask the User for the User's password. The User should never write the password on something others may see.

The User should contact the AMC/ the Mutual Fund immediately to change the password if the User suspects that someone has discovered it. Information the User submits in the electronic form through the AMC's / the Mutual Fund's website, as well as the information the AMC/ the Mutual Fund sends back to the User while the User is visiting the AMC's/ the Mutual Fund's website is protected and encrypted. The AMC's secure server software encrypts information, ensuring that Internet communications through the AMC's/ the Mutual Fund's website stay private and protected. To enable the Users to process transactions at the AMC's / the Mutual Fund's website, the AMC/ the Mutual Fund uses cookies.

The User's account information is not permanently stored on the AMC's server. The information only resides on the AMC's and/or Service Providers Web server while the User is viewing the information. It is permanently stored on the AMC's and/or Service Providers secured corporate computer systems. The corporate network systems, which store the User's account information, use proven security controls and has data security staff whose sole responsibilities are to ensure the security of the information that it processes and stores.

The AMC / the Mutual Fund has policies and procedures in place to limit access to the User's information to only those who have a business need to view it.

H. Data Use, Retention, Storage, Transfer and Disposal

The AMC/ the Mutual Fund may retain the data as may be provided by the Users till such time as may be provided under the law and as long as necessary for the AMC/ the Mutual Fund to provide services to the User or the User asks the AMC/ the Mutual Fund to not retain the User's data. The AMC/ the Mutual Fund may retain some of the User's personal information as necessary for the AMC's / the Mutual Fund's legitimate business interests, such as fraud detection and prevention and enhancing safety.

The AMC/ the Mutual Fund may store and use the User's personal information to the extent necessary to comply with legal obligations. Additionally, some copies of the User's information (e.g., log records) may remain in the AMC's database, but are disassociated from personal identifiers. Because of the way the AMC maintains certain services, after the User deletes information, residual copies may take a period of time before they are deleted from the AMC's active servers and may remain in the AMC's backup systems.

The AMC performs the disposal of storage devices and systems in a safe and secure manner whenever such hardware devices/equipment are end of life/end of support to minimize the risk of sensitive information leakage to unauthorized persons. The data /information on such devices and systems are removed as applicable prior to disposal to make the original information non-retrievable.

I. Disclosure to third parties

The AMC/ the Mutual Fund may transfer the User's personal information to the AMC's / the Mutual Fund's Service Providers for the purposes of processing the User's information as part of the AMC's/ the Mutual Fund's customer services.

The AMC shall reveal only such information to external authorities as may be found relevant and necessary in order to comply with the applicable laws of the land and to the Service Providers to ensure smooth functioning of the activities as may be prescribed under applicable laws like RTA/distributors/banks/sub-brokers/call-centers/custodians/depositories and such other entities/persons. By using AMC's website or by agreeing to transact with AMC, Customer agrees to the above sharing of

information during its relationship with AMC. The AMC may also be required from time to time to disclose User's personal information to governmental or judicial bodies or agencies or regulators based on their requirement to comply with the applicable laws including cyber laws. Further, such information may also be used by the AMC to generate statistics and reports and/or to protect and defend the rights, interest and property of the Mutual Fund, the AMC, the Trustee Company, Sponsors & its affiliates and directors and/or to enforce legal rights or provisions of the Scheme related Documents of the Mutual Fund viz. Scheme Information Document (SID), Statement of Additional Information (SAI) and Key Information Memorandum (KIM).

Nevertheless, it shall be the AMC's foremost endeavor to ensure that the Customer's Privacy is protected at all points in time. The Users must ensure to recheck the information or data being provided to the AMC or any person acting on its behalf. In case if any of the data/information is found to be inaccurate or incorrect, the same shall be informed to the AMC for immediate amendment. The AMC and any person acting on its behalf shall not be responsible for the authenticity of the personal information or sensitive personal data or information supplied by the Users (whether existing/prospective).

J. Cookies

Our website may use cookies. By using our website and agreeing to these terms of use, you consent to our use of cookies in accordance with the terms of our privacy policy. Users shall not be covered by the terms of this Policy if they access other websites using links from this website.

Further, despite our efforts to protect Users privacy, if unauthorized persons breach security control measures and illegally use such sensitive/personal data or information, the Mutual Fund, AMC, Trustee Company, Sponsors and its affiliates and directors under such circumstances shall not be held responsible and/or liable.

K. Monitoring and enforcement

The AMC takes appropriate security measures to monitor unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of the AMC's/ the Mutual Fund's data collection, storage and processing practices and security measures.

The AMC would ensure to enter suitable terms with its Service Providers in order to protect client confidentiality and follow a non-disclosure or restricted disclosure policy. Further, the employees who violate the privacy and confidentiality promise shall be subjected to disciplinary action.

L. Grievance redressal

If investors/customers/clients have any concerns relating to their personal and sensitive information they may be addressed, it to the Client Service Department. For more details

please refer to the Scheme related documents available on our website viz.
mf.whiteoakamc.com

M. Amendments/Modifications

This Privacy Policy available on our website is current and valid. However, the AMC reserves the right to amend/modify any of the sections of this policy at any time and the clients/customers/investors are requested to keep themselves updated for changes by reading the same from time to time.

Users agrees to the terms of this Policy if they enter and use this website or provide any information.