Privacy Policy

Introduction

Fincliff Capital ("we," "our," "us"), operating under Sagar Pujari & Co., is a SEBI Registered Investment Advisory firm (Registration No. INA000020989). We are committed to protecting your privacy and ensuring the confidentiality of the information you share with us. This Privacy Policy explains how we collect, use, store, protect, and share your personal information in compliance with applicable laws, including the SEBI (Investment Advisers) Regulations, 2013 and the Information Technology Act, 2000, relevant rules thereunder.

1. Information We Collect

We collect information that is necessary to provide you with investment advisory services and ensure compliance with legal and regulatory requirements.

(a) Personal Information
- Name, date of birth, gender, nationality, and contact details (email, phone number, address).
- Identity proof (PAN, Aadhaar, Passport, etc.) as mandated by SEBI/KYC guidelines.
- Bank account details, income details, and financial documents required for risk profiling and suitability assessment.

(b) Financial & Transactional Information
- Assets, liabilities, portfolio details, investment history, tax-related details.
- Risk appetite, investment preferences, and goals.

(c) Website/Technology Information
- IP address, device details, browser information, cookies, and usage data for website performance and security.

2. Purpose of Data Collection

We use the information solely for:
- Regulatory Compliance: KYC/AML verification as per SEBI and applicable laws.
- Service Delivery: Providing investment advisory, risk profiling, asset allocation, and client reporting.
- Communication: Sending updates, portfolio reports, transaction confirmations, research insights, and regulatory notices.
- Improvement: Enhancing user experience, website security, and customer support.

We do not sell, rent, or trade your personal information.

3. Data Sharing & Disclosure

Your personal information may be shared only in the following circumstances:

- Regulatory Authorities: With SEBI, RBI, Income Tax Department, or other authorities as mandated by law.
- Service Providers: With technology vendors, auditors, and compliance partners bound by strict confidentiality obligations.
- Legal Requirements: When disclosure is required to comply with court orders, law enforcement, or protect our legal rights.
- With Consent: Where you explicitly authorize us to share data (e.g., with your tax consultant or portfolio manager).

4. Data Security

We implement industry-standard security practices, including:
- Encryption of data in transit and at rest.
- Restricted Access to client data on a need-to-know basis.
- Firewalls and intrusion detection systems to prevent unauthorized access.

However, no system is 100% secure. While we strive to protect your data, we cannot guarantee absolute security.

5. Data Retention

- Personal and financial data is retained as long as necessary to provide services and comply with SEBI regulations (typically 7 years from the end of the client relationship).
- Data may be retained longer if required for legal, regulatory, or dispute resolution purposes.

6. Your Rights

Subject to applicable law, you have the right to:
- Access and obtain a copy of your personal data.
- Request correction of inaccurate or incomplete information.
- Withdraw consent for non-essential processing.
- Request deletion of your data (subject to regulatory retention requirements).
- Lodge complaints with SEBI or the Data Protection Authority (if applicable).

7. Cookies & Tracking Technologies

We use cookies and similar tools to improve website functionality, analyze traffic, and personalize content. You may disable cookies in your browser, but some features may not function properly.

8. Third-Party Links

Our website may contain links to external sites. We are not responsible for the privacy practices or content of such websites.

9. Changes to Privacy Policy

We may update this Privacy Policy periodically to reflect legal, regulatory, or operational changes. The updated policy will be posted on our website with a revised “Last Updated” date.