

PRIVACY POLICY STATEMENT

The following Privacy Policy Statement is prepared by UpperCrust Wealth Pvt. Ltd. and effected from **15th September 2021.**

UpperCrust Wealth Pvt. Ltd. (herein referred to as either UpperCrust or the company in the entire statement) believes in protecting the data provided and used during its engagement with clients (herein referred to as either clients or parties in the entire statement), and considers this statement as the core of its practices. The company will not transfer the collected data to unaffiliated third parties unless otherwise mentioned at a time of collection, or without the approval of the client as the case may be thereby protecting and defend the rights of users involved.

Data Collection and Processing

The company will collect and use the personal data of clients to achieve the purpose as stated in the engagement letter executed with clients.

Utilization of Personal Data

The company will collect, use, transfer and disclose the details of clients to its affiliates or associates to manage the business activities to the extent that it has been disclosed with clients at a time of engagement. The company ensures complete confidentiality while transferring data and closely monitoring how that is used.

Compliance with Laws and Regulations

While processing clients' data, UpperCrust strictly follows and complies with data privacy laws and its internal policies. The reason to collect, use, and transfer the data prevails following conditions, like,

- Complying with a legal obligation to which it is subject to execute the transaction
- Pursuing legitimate interests as stated in Contracts between two parties – UpperCrust and its clients
- Ensuring that UpperCrust's network, its affiliates are secure
- Administering and conducting business activities

Control Mechanism

UpperCrust maintains the highest standards of managing its business activities with proper control mechanisms in place thereby preventing fraud. Besides this, UpperCrust applies protocols and controls, security arrangements for all sorts of data that it collects from clients. The company maintains the entire process while accounting risks associated with the data, and utilize risk management practices that helps protects the data collected. The company retains clients' data so long as they are needed to perform the entire transaction from the scratch to final outcome.

Access to Personal Data

When it comes to access your personal data within the gamut of UpperCrust will be limited to those employees, authorities who want to know the information for the purpose as described in the engagement letter or mandate letter. The various internal authority at the company needs to access clients' data namely IT & Security, HR, Compliance and Legal Team, Research Team, Finance & Accounting Team.

The entire site www.uppercrustwealth.com is designed and maintained by the company's affiliated Studio33 based in Vadodara, Gujarat. The company and its affiliates/associates ensure the safeguarding of data that it collect and hold during the entire transaction.

For any queries related to the aforesaid policy statement, please feel free to contact **Shaily Pandya** at **mail@uppercrustwealth.com**