

Arete Capital Services Private Limited

Privacy Notice

Effective Date: 1st April 2026

Last Updated: 16th July 2026

1. Introduction

Arete Capital Services Private Limited ("Arete Capital", "Company", "we", "our", or "us") respects your privacy and is committed to protecting the personal information entrusted to us by our customers, prospective customers, business representatives, investors, and website visitors.

Arete Capital acts as a Data Fiduciary with respect to the personal information collected and processed through our website and other direct interactions with customers. As a Data Fiduciary, Arete Capital determines the purpose and manner in which personal information is collected and processed and is responsible for ensuring that such processing is carried out in accordance with applicable privacy and data protection laws.

This Privacy Notice describes how Arete Capital collects, uses, processes, retains, and protects personal information provided through our website or through other direct communications with us.

This Privacy Notice is designed to provide transparency regarding our privacy practices and our approach to handling personal information in accordance with applicable privacy and data protection laws.

By accessing our website or voluntarily providing your personal information, you acknowledge and understand the practices described in this Privacy Notice.

2. Scope of this Privacy Notice

This Privacy Notice applies primarily to personal information collected from customers, prospective customers, business representatives, investors, and website visitors through:

- our website;
- customer enquiry forms;
- requests for information regarding our investment banking, advisory, and financial services; and
- communications initiated by customers or other individuals with Arete Capital.

This Privacy Notice also applies to personal information collected during meetings, correspondence, and other direct business interactions relating to our investment banking and advisory services.

Arete Capital collects and processes personal information only for lawful business purposes relating to responding to enquiries, establishing and managing business relationships, providing investment banking and advisory services, and complying with applicable legal and regulatory obligations.

3. Information We Collect

When you contact us, request information, or seek our investment banking or advisory services, we may collect certain personal information necessary to understand and respond to your requirements.

The personal information collected includes:

Identity and Contact Information

- Name;
- Email address;
- Telephone/mobile number;
- Company name;
- Designation; and
- Any other contact details voluntarily provided by you.

Information Provided During Business Interactions

We may collect personal information voluntarily provided by you during meetings, correspondence, enquiries, discussions, or other business interactions necessary to understand your requirements and provide the requested investment banking or advisory services.

Customer Onboarding Information

Where you engage Arete Capital for investment banking, capital market, or other advisory services, we may collect personal information necessary to establish the business relationship, conduct customer onboarding, and comply with applicable legal and regulatory requirements.

The personal information collected may include:

- Name;
- Contact details;
- Designation;
- Organisation details, where applicable;
- Permanent Account Number (PAN) or other tax identification information, where required;
- Identity and address verification information;
- Know Your Customer (KYC) information and supporting documents, where required under applicable laws or regulatory requirements; and
- Any other information necessary to provide the requested services or comply with legal obligations.

Technical Information

Where you interact with our website, we may automatically collect limited technical information such as:

- IP address;
- browser type;
- device information; and
- website usage information.

Such information is collected to maintain website functionality, security, and improve user experience.

4. Purpose of Collection and Processing

Arete Capital collects and processes personal information only for purposes necessary to provide information, respond to customer requests, establish or manage business relationships, and provide investment banking and advisory services.

The purposes include:

- responding to customer enquiries and requests;
- understanding customer requirements;
- providing information regarding our investment banking and advisory services;
- preparing proposals, engagement letters, quotations, or business communications;
- initiating and managing customer relationships;
- providing requested investment banking or advisory services;
- maintaining communication regarding customer requirements;
- maintaining business records; and
- complying with applicable legal and regulatory obligations.

Where required by applicable laws, regulations, or internal compliance procedures, Arête Capital may process personal information for customer due diligence, conflict checks, anti-money laundering (AML), Know Your Customer (KYC), sanctions screening, fraud prevention, and other regulatory compliance activities. Arete Capital follows the principle of data minimisation and collects only information that is reasonably necessary for the intended purpose.

5. Lawful Processing of Personal Information

Arete Capital processes personal information only for lawful purposes in accordance with applicable privacy and data protection laws.

Personal information is processed where it is necessary to:

- respond to customer enquiries;
- provide information regarding our investment banking and advisory services;
- take steps requested by customers before entering into a business relationship;
- establish and manage business relationships;
- provide the requested services; or
- comply with applicable legal and regulatory requirements.

Where applicable laws require consent for specific processing activities, Arete Capital will obtain such consent before processing the relevant personal information.

6. Disclosure of Personal Information

Arete Capital maintains the confidentiality of personal information and does not sell, rent, lease, trade, or disclose personal information to third-party organisations, vendors, or service providers for commercial purposes.

Personal information may be disclosed only in limited circumstances, including:

- where required by applicable laws or regulations;
- pursuant to an order, direction, or request from a court, government authority, regulator, or law enforcement agency;
- where disclosure is necessary to protect the legal rights, safety, or security of Arete Capital or its stakeholders; or
- where disclosure is necessary to facilitate services requested by the customer and is permitted under applicable laws.

Any disclosure made under such circumstances will be limited to the information necessary for the relevant purpose.

7. Security Practices and Procedures

Arete Capital implements reasonable administrative, technical, and organisational safeguards to protect personal information against unauthorised access, misuse, loss, alteration, or disclosure.

The security measures adopted by Arete Capital include:

- controlled access to personal information;
- secure systems and networks;
- password-protected access to information systems;
- periodic review of security measures; and
- employee confidentiality obligations.
- Data in Transit and Rest Encryption

Arete Capital continuously reviews its security practices and may enhance its safeguards based on business, technological, and regulatory requirements.

8. Data Retention

Arete Capital retains personal information only for the period necessary to fulfil the purpose for which it was collected or as required under applicable laws.

Information may be retained for:

- managing customer relationships;
- maintaining business records;
- fulfilling contractual obligations;
- responding to legal and regulatory requirements; and
- resolving disputes.

After the applicable retention period, personal information will be securely deleted, anonymised, or disposed of in accordance with internal practices.

9. Rights of Individuals

Subject to applicable privacy laws, individuals may have rights relating to their personal information, including:

- requesting access to personal information held by Arete Capital;
- requesting correction or updating of inaccurate information;
- requesting deletion of information where legally permissible;
- withdrawing consent where processing is based on consent; and
- raising concerns regarding the processing of personal information.

Requests may be submitted using the contact details provided below.

10. Website Cookies

Arete Capital may use cookies or similar technologies to support website functionality, maintain security, and understand website usage patterns.

Users may manage cookie preferences through their browser settings. However, disabling certain cookies may affect the functionality of the website.

11. Changes to this Privacy Notice

Arete Capital may update this Privacy Notice periodically to reflect changes in applicable laws, business practices, or technology.

The updated version will be published on our website with the revised Effective Date.

12. Children's Personal Information

Arete Capital's website and services are intended for business customers and individuals who are legally capable of providing their personal information.

Arete Capital does not knowingly collect or process personal information of children or individuals below the age prescribed under applicable privacy laws. Parents or legal guardians who believe that a child's personal information has been provided to Arete Capital without appropriate consent may contact us using the details provided in this Privacy Notice.

13. Cross-Border Transfer of Personal Information

Arete Capital primarily processes and stores personal information in accordance with applicable privacy and data protection laws.

Where personal information is required to be transferred, accessed, or processed outside India, Arete Capital will ensure that such transfer is undertaken only in accordance with applicable legal requirements and subject to appropriate safeguards.

Such safeguards may include:

- ensuring that the transfer is permitted under applicable privacy laws;
- implementing appropriate contractual, technical, and organisational measures;
- maintaining the confidentiality and security of personal information; and
- ensuring that the information is processed only for the intended purposes.

Arete Capital will take reasonable measures to ensure that personal information transferred outside India continues to receive an appropriate level of protection consistent with applicable privacy requirements.

14. Contact Information

For questions, concerns, or requests relating to this Privacy Notice or personal information processed by Arete Capital, please contact:

Mr. Dinesh Agarwal
022 4043 9000
dinesh.agarwal@aretecapital.co.in

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