

JPMorgan Privacy Policy-India

[Effective April 11, 2011]

1. Introduction

This Policy applies to JPMorgan Chase Bank N.A., India, J.P. Morgan Securities India Private Limited, J.P. Morgan India Private Limited and J.P. Morgan Advisors India Private Limited collectively referred to as "JPMorgan India".

JPMorgan India recognizes the importance of "Personal Information" including "Sensitive Personal Information" (as defined below), provided to it by natural persons (information providers as defined below), under lawful contract and the trust they place with respect to maintaining the security of this information. With respect to Personal Information including Sensitive Personal Information, JPMorgan India will take reasonable steps to keep such information confidential and may share it with affiliates and third parties on a need to know basis under appropriate arrangements. Such information would generally include any information which is capable of identifying you i.e: name, address etc.

You agree and confirm that JPMorgan India may disclose and transfer the PI collected about you to any of its affiliates, agents or third party service providers in connection with the products or services you have sought from, or your employment with JP Morgan India or to provide better services to you or to ensure compliance with a legal or contractual obligation of JP Morgan India. The purpose for which JP Morgan India would collect and use your PI may include instances set out in Clause 3 B below. The types of third parties (whether in India or overseas) your PI could be disclosed to may include the types of third parties mentioned at clause 5 below.

As per the requirements of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("RSP Rules") this Policy outlines the manner in which the Personal Information or Sensitive Personal Information will be handled or dealt with by JPMorgan India.

The Information Security Management System (ISMS) of JP Morgan India meets the criteria of ISO/IEC 27001 :2005 ISMS requirements Standard.

2. Definition of "Personal Information", "Sensitive Personal Data or Information" and "Information Provider"

"Personal Information" hereinafter referred to as "PI", for the purposes of this Policy, refers to any information that relates to a natural person which either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

"Sensitive Personal data or information of a person" hereinafter referred to as "Sensitive Personal Information" or "SPI", for the purposes of this Policy refers to such personal information about a natural person, which consists of information relating to:

- I. Password;
- II. Financial information such as Bank account or credit card or debit card or other payment instrument details;
- III. Physical, physiological and mental health condition;
- IV. Sexual orientation;
- V. Medical records and history;
- VI. Biometric information;
- VII. Any detail relating to the above clauses as provided to us for providing services; and
- VIII. Any of the information received under any of the above clauses by us for processing, storing or processing 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 Information for the purposes of this Policy.

"Information Provider" for the purpose of this Policy, refers to a natural person or individual who, provides PI or SPI directly under lawful contract to JPMorgan. In this Policy, the providers of information are referred to as "you".

3. Purpose of collection and use of Sensitive Personal Information

- a) JPMorgan India will ordinarily collect Sensitive Personal Information that it believes is necessary for a lawful purpose connected with a function or activity necessary to deliver, promote or market services or products or to carry out primary business functions and/or activities, comply with applicable regulations or in the capacity as an employer or a counterparty to agreements with individuals. Ordinarily, JPMorgan India will only collect such information about you when you provide it or you have consented to provide the information or where it is required by law.

JPMorgan India will only collect such information by lawful and fair means and not in an unreasonably intrusive way.

JPMorgan India will collect such information from you when you apply for a product or a service, or if you visit the website www.jpmorgan.com/pages/jpmorgan/ap/in/home or www.jpmorgan.com/pages/jpmorgan/ap/in/bankservices. Any such information collected will be kept confidential.

- b) Apart from the necessity to collect your information in order to provide a service to you or maintain a business or employment relationship with you, the purposes for which JPMorgan India would generally collect and use your Sensitive Personal Information will include but are not limited to:

- complying with legislative and regulatory requirements;
- performing administrative functions; and
- offering you products and services that may interest you.

c) The SPI collected from you may be collected and/or retained either directly by JPMorgan India or through or with an affiliate or third party. The name and address of a few such entities that may collect and/or retain SPI is provided below:

- J. P. Morgan Services India Private Limited, Prism Towers, Mindspace, Malad West, Mumbai 400 064, India
- J. P. Morgan Services India Private Limited, Paradigm Towers, Mindspace, Malad West, Mumbai 400 064, India
- J. P. Morgan Services India Private Limited, Prestige Technology Park, Sarjapur Outer Ring Rd, Vathur Hobli, Bangalore, 560 087, India
- J. P. Morgan Services India Private Limited, Mindspace, Hitech City, Hyderabad 500081, India
- JPMorgan Chase Bank N.A. 270 Park Avenue, New York, NY, 10017-2014, United States and its branches worldwide

You may write to : jpmorgan_indiaprivacyoffice@jpmorgan.com for an expanded list.

JPMorgan India, its affiliates and third parties it shares SPI with, will not retain the SPI collected for longer than is required for the purposes for which such information may be lawfully used or is otherwise required under any law for the time being in force.

The SPI collected shall be used for the purpose for which it has been collected.

You have the option not to provide JPMorgan India with the SPI sought to be collected. You also have the option to withdraw the consent given earlier provided it is sent to us in writing.

In the event SPI which JPMorgan India deems necessary for providing you with any product or service is not provided or if consent is withdrawn subsequently, JPMorgan India reserves the right not to, provide you with the product or services or establish or continue its relationship with you.

4. Personal information about third parties

While providing PI or SPI of another natural person to JPMorgan India please ensure the appropriate authorization of that natural person is obtained.

5. Disclosure of Sensitive Personal Information

In general, JPMorgan India will not use or disclose SPI collected about you to a third party otherwise than for the purposes set out in this Policy, unless the disclosure is necessary for compliance of a legal obligation or where it is agreed to in the contract with you or as consented by you. JPMorgan India will also not publish the SPI unless the same is required for compliance of a legal obligation or as consented by you.

Provided that such information shall be shared without your consent, with government agencies mandated under law to obtain information including SPI for the purpose of verification of identity or for prevention, detection, investigation including cyber incidents, prosecution and punishment of offences.

Notwithstanding anything contained in the preceding paras of this section, any SPI shall be disclosed to any third party by an order under a law for the time being in force.

You authorize JPMorgan India to disclose necessary SPI to affiliates, agents or third party service providers who provide services to JPMorgan India in connection with the products or services you have sought from, or, your employment with, JPMorgan India.

These parties are prohibited from using your SPI except for the specific purpose for which JPMorgan India supplies it to them and from disclosing it further.

Subject to what is permitted by law, the types of third parties (whether in India or overseas) your SPI could be disclosed to may include:

- agents, contractors, service providers, insurers and external advisers engaged by JPMorgan India from time to time to carry out, provide services or advise on the functions and activities;
- other related bodies corporate /affiliates of JPMorgan India
- any person or organization who introduces you to JPMorgan India;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- external payment systems operators;
- debt collection agencies;
- other banks or financial institutions;
- any person who JPMorgan India deems necessary for carrying out the instructions you give to JPMorgan India; and
- any prospective transferee in a scheme of arrangement, amalgamation, merger or sale of shares or sale of business relating to the whole or part of JP Morgan India.

6. Transfer of Sensitive Personal Information

JPMorgan India may transfer your SPI to any person or entity whether in India or located in any other country that ensures a similar level of data protection as provided in the RSP Rules when the same is necessary for the performance of a lawful contract with you or where you have consented to such transfer. The SPI transferred would include such information provided to JPMorgan India either directly by you (the information provider) or by any legal entity with whom you (the information provider) are associated with in any capacity.

7. Services provided via JPMorgan India's internet website

JPMorgan India's compliance with the RSP Rules also extends to when you transact business via web based channels provided to you. The terms and conditions of usage and any privacy notices are clearly posted on the website.

When you use a link from the JPMorgan India website to the websites of third parties, those websites are not subject to JPMorgan India's privacy standards. The third parties are responsible for informing you of their own privacy policies.

For statistical purposes, information may be collected on website activity (such as the number of users who visit the website, their country, the date and time of visits, the number of pages viewed, navigation patterns and the operating systems and browsers used to access the site). This information on its own does not identify an individual but it does provide statistics that can be used to analyze and improve the website.

When you use the JPMorgan India website, a temporary cookie may be sent to you. A 'cookie' is a packet of information that allows the server to identify and interact more effectively with your computer, that gives you a unique identification number. This identification number is sent each time you use the website. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent, however, if you do not accept cookies, you may not be able to make full use of the JPMorgan India website. At the end of your interaction with JPMorgan India website, the cookie no longer exists and it cannot be used for further identification or access to your computer.

8. Access to your Sensitive Personal Information

You may review the SPI you have provided to us for the purpose of ensuring the said information is accurate. JPMorgan India shall not be responsible for the authenticity of the information you have supplied to it or to any person acting on its behalf.

JPMorgan India may not be able to provide access to information which is not directly provided by you.

JPMorgan India may charge you a fee for accessing your SPI.

9. Information Security Standard for SPI in JP Morgan India

JPMorgan India operates ISMS which complies with the requirements of ISO/IEC 27001 :2005 ISMS requirements Standard for ensuring that the SPI it holds is protected from misuse, loss and unauthorized access, modification or disclosure.

10. Direct marketing

JPMorgan India may use your personal details, including your address, to provide you with newsletters and information about products, services or other events that may be of interest to you.

If at any time you do not wish to receive such marketing information, you have the option to request not to send you any further such material and you may do so by writing to your Relationship Manager or the Privacy Officer.

11. Grievance handling

You may contact the Privacy Officer, who is the designated grievance officer, for any grievances or discrepancies with respect to processing your Sensitive Personal Information. JPMorgan India will make every effort to resolve your grievance expeditiously.

Name of Privacy Officer: Sangeeta Patnaik

Email: jpmorgan_indiaprivacyoffice@jpmorgan.com

12. Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. You may at any time access a current version of the Privacy Policy from the website, www.jpmorgan.com/pages/jpmorgan/ap/in/home or www.jpmorgan.com/pages/jpmorgan/ap/in/bankservices.

JPMorgan India encourages you to review the Privacy Policy periodically for updates if any.

13. Need more information?

If you have a query concerning how your Sensitive Personal Information is collected and used or in relation to JPMorgan's Privacy Policy, please contact the Privacy Office at jpmorgan_indiaprivacyoffice@jpmorgan.com.