

First Rate WealthTech

Information Privacy Policy

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Table of Contents

1. Our Privacy Commitment	4
2. Security Organization	4
2.1. Policy Statement	4
2.2. Policy Details	4
2.2.1. Authorization Process for Information Processing Facility	4
2.2.2. Contact with Special Interest groups	4
2.2.3. Contact with Authorities	4
2.2.4. Independent Review of Information Security	5
2.2.5. Segregation of Duties`	5
2.3. Security Organization Structure	5
2.3.1. Information Security Steering Committee (ISSC)	5
2.3.2. Information Security team	6
3. What Information we collect.....	8
4. How we collect Information	9
5. How we use your Information	9
6. Data Security	10
7. Opt Out Choices	10
8. How long do we keep personal information for?	10
9. How can you access, amend or take back the personal data that you’ve given to us?	11
10. Do not sell my personal information	11
11. Policy Changes	11
12. Acceptance of Privacy Practices	12

1. Our Privacy Commitment

First Rate WealthTech is committed to protecting their privacy. This privacy Policy is intended to inform clients of the types of personal/ business information First Rate WealthTech collects, how it is used and what steps are taken to ensure that information is kept confidential and secure.

First Rate WealthTech privacy policy will be reviewed from time to time to take into account new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current First Rate WealthTech.

This Privacy policy is based on The California Consumer Privacy Act of 2018 (CCPA) which gives consumers more control over the personal information that businesses collect about them including:

- The right to know about the personal information a business collects about them and how it is used and shared;
- The right to delete personal information collected from them (with some exceptions);
- The right to opt-out of the sale of their personal information; and
- The right to non-discrimination for exercising their CCPA rights.

Below is the personal information that FRWT collects, processes/uses and secures.

2. Security Organization

2.1. Policy Statement

An organizational structure shall be defined to initiate and control implementation of information security throughout the organization. A management forum will ensure that there is clear direction and visible management support for security initiatives.

2.2. Policy Details

2.2.1. Authorization Process for Information Processing Facility

All new Information Processing Facilities shall be set up in accordance with the Security Policy of First Rate WealthTech. A Risk Assessment and an Internal Audit shall be done at regular intervals in line with the Risk Assessment methodology. The Information Security Group, based on the recommendations of the Information Security Manager, would define the acceptable risk levels.

2.2.2. Contact with Special Interest groups

Based on requirements, and proper validation of the vendor, Specialist advice shall be sought. This could be by way of having a Security Consultant on a yearly contract or on a per-call payable basis. The same could also be sought from non-profit agencies like CERT.

2.2.3. Contact with Authorities

Appropriate contacts with law enforcement authorities, regulatory bodies, fire department, emergency services, telecommunication providers and other service providers shall be maintained by the organization. These contacts ensure help can be availed of and is accessible during a crisis.

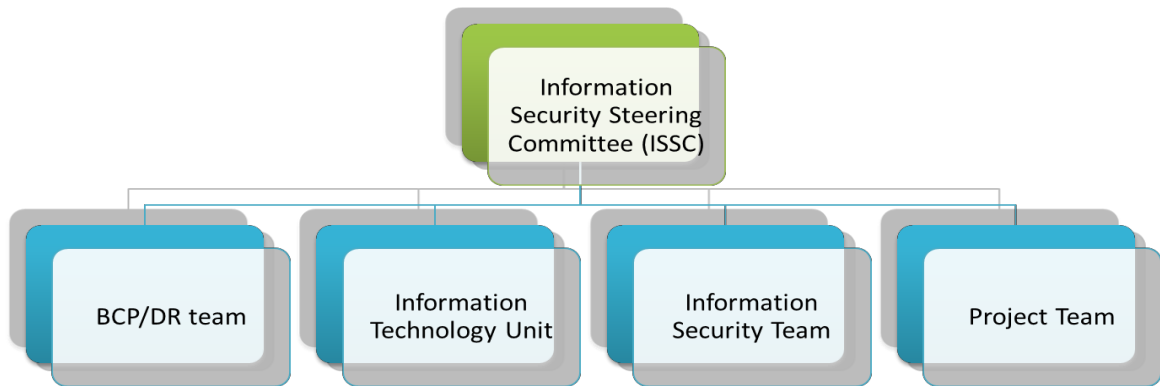
2.2.4. Independent Review of Information Security

It is the responsibility of the Information Security Manager to plan and conduct Internal Audit of the First Rate WealthTech Information Security Management System. These audits shall be carried out by the Internal Audit team. The Information Security Manager shall decide the frequency of audits to suit its operations, however once a year is mandatory. The Internal Audit Team may comprise of external consultants also.

2.2.5. Segregation of Duties`

Segregation of duties for every employee shall be defined to prevent misuse of information or services. The duties shall be carefully considered by the Head of the IT department while assigning responsibilities to the IT staff based on the nature of duties and the availability of staff. Separate responsibilities are also defined for the administrators.

2.3. Security Organization Structure



2.3.1. Information Security Steering Committee (ISSC)

The Information security Steering Committee (ISSC) will be a cross-functional team led by the, VP Operations and comprised of other senior management from various functional areas.

The ISSC will undertake the following:

- Review and approve Information Security Policies and overall responsibilities;
- Ensure that all users are aware of their security roles and responsibilities;
- Ensure that appropriate security awareness is created throughout the organization;
- Ensure that the security culture seeps into the organization;
- Monitor significant changes in the exposure of information assets to various threats;
- Identify, classify and periodically review the criticality and confidentiality

requirements of all types of information resources;

- Ensure that information security issues are appropriately addressed in the Business Plan;
- Approve major initiatives to enhance information security.

The Information Security Steering Committee will meet at least once every quarter (Three months) to assess the security requirements of First Rate WealthTech.

2.3.2. Information Security team

The Information security team will be responsible for the execution of the information security program enforced by ISSC and implemented for First Rate WealthTech. This team has three areas of responsibility: policy development, practice, and response.

- **Policy development** is focused on establishing and reviewing security policies for the company. At a minimum, both the risk analysis and the security policy will be reviewed annually.
- **Practice** is how the security team conducts the risk analysis, the approval of security change requests, reviews of security alerts from vendors and turns plain language security policy requirements into specific technical implementations.
- **Response** relates to how the team responds to violations identified by any monitoring systems and who does the actual troubleshooting and fixing of such a violation. Each security team member should know in detail the security features provided by the equipment in his or her operational area.

Information Security Officer (ISO)

ISO will be part of the ISSC, the governing body for the Information Security Organization. He / She will have the following responsibilities:

- Manage the overall Information Security program at First Rate WealthTech;
- Understand the business processes of the organization, to provide appropriate security protection;
- Responsible for developing and maintaining the Information Security Policies, procedures and Standards for use throughout First Rate WealthTech;
- working with the Head of departments and IT Unit to ensure that an effective process for implementing and maintaining the security controls is in place;
- Encourage the participation of the Head of departments, auditors and the staff members from various disciplines, who can contribute to the information security program;
- Assist in responding to the security issues relating to the customers including the letters of assurance and suitable replies to the questions on information systems security, as and when raised by the customers;
- Review audit and examine reports dealing with the information security issues and place them before the Information Security Steering Committee during regular meetings;

The key threats to the information assets shall be defined and communicated to the management of the organization at various point of time;

- Responsible for the coordination of any Incident Response procedures undertaken in response to potential security breaches. Co-ordinate or assist in the investigation of security threats or other attacks on the information assets;

- Responsible for preparation, maintenance, and testing of contingency plans or disaster recovery plans;
- Ensure that adequate security training is provided to various end users and security awareness programs are conducted regularly;
- Review and Approval of prioritization plan for implementing patches and fixes for vulnerabilities identified sometimes.

Information Security Analyst (ISA)

ISA shall be entrusted with managing security-related operations daily and coordinating with the IT team for implementation/maintenance of the Information Security Program. They will have the following responsibilities:

- Responsible for ensuring maintenance of Information Security Policies, procedures and Standards for use throughout First Rate WealthTech;
- ensuring that all critical operations are carried out in accordance with the security guidelines;
- Work with the ISO and IT Unit to ensure that an effective process for implementing and maintaining the security controls is in place;
- Remain current/up to date on the threats against the information assets. Attending information security meetings, reading trade publications and participation in work groups are some of the ways to stay current/up to date with the developments in the field of information systems security;
- Understand the current information processing technologies and the most current information protection methods and controls by receiving internal education, attending information security seminars and through on-the-job training;
- Review audit and examine reports dealing with the information security issues and ensure that they are placed before the ISO at pre-determined intervals;
- The key threats to the information assets shall be defined and communicated to the ISO;
- Assume responsibility or assist in the preparation and distribution of an appropriate warning system of potentially serious and imminent threats to First Rate WealthTech information assets e.g. outbreak of computer virus etc.;
- Ensuring that systems and the network are secure and that any breach is quickly identified analyzed and fixed;
- Responsible for the coordination of any Incident Response procedures undertaken in response to potential security breaches. Co-ordinate or assist in the investigation of security threats or other attacks on the information assets;
- Reporting security incidents and violations to the Information Security team;
- Assist in the recovery of information and information assets from such attacks;
- Responsible for conducting network and system reviews to check for policy compliance and loopholes in the infrastructure. This could be done using approved automated tools to save time and provide user friendly reporting;
- Reporting security incidents and violations to the ISO;
- Responsible for the inspection, configuration checking and logging activities of all security products and security configuration of other systems;
- Ensure that adequate security training is provided to various end users and security awareness programs are conducted regularly;
- Provide basic security training to the IT team sometimes. This responsibility also covers that any new IT staff member be given a security briefing at the time of joining;
- Preparation of prioritization plan for implementing patches and fixes for vulnerabilities identified sometimes.

Weekly update to the ISO regarding the status of information security initiatives. It shall include:

- o Any observed non-compliances/ major incidents reported/managed
- o Corrective and Preventive Actions required

3. What Information we collect

Our business is to understand and meet our client's need for our companywide services. To do this effectively, First Rate WealthTech collects and holds both consumer and business information.

Individual information held on a individual may include:

- First Name/and or Initial
- Last Name
- Gender
- Address
- Contact Telephone and e-mail particulars
- Zip Code

Business information held on an entity may include:

- Job Title
- Contact name
- Age
- Gender
- Preferences, Interest and Favorite
- Company Name
- Postal Address of Company
- Telephone Number of Company
- Email Address
- Website Address
- IP Address
- Browser type
- Domain names
- Access times
- Company profile/Description
- Number of employees
- Year of incorporation

Information that is collected through automated means may include:

- IP address- may use IP address for traceability
- Browser types- use data subject's browser types for better experience
- Browser version- To identify the operating system and screen size of your device to ensure all content renders appropriately
- Google Analytics Information- The pages of our site that you visit, the time and

- date of your visit, the time spent on those pages and other statistics
- Geographic location- For language preference
- Social networking plugins- To redirect the data subject onto one of our social media pages

We also provide demos to our prospective customers where we host the productframework at our own end.

Product Trial / DEMO:

Potential clients of First Rate WealthTech sign up or are requested to try our proprietary products. During the trial, clients willingly submit / upload documents to try the efficiency and accuracy of our products. The documents may be in image, excel or PDFformat and could be compressed or non-compressed (.Zip, .rar, etc). Following information may be included as part of the trial phase:

On Sign Up:

- Name
- Email
- Gender
- Phone Number (optional)
- Password

On New Case Creation (Trial) – Bank Statement

- Account Number
- Account Holder Name
- Account Type
- Routing Number
- Name Of Bank
- Bank Address
- Current Balance
- Open Balance
- Closing Balance
- Total Deposits
- Total Withdrawals

4. How we collect Information

During business, First Rate WealthTech acquire information in primary 3ways, use and disclose your personal information:

- We acquire it from other clients;
- We collect it from Publicly available sources and Professional paid services;
- Potential Clients sign up for trial of our products and willingly submit the documents / information which contain personal as well as business information.

Maintaining confidential personnel information is a top priority at First Rate WealthTech.

Only authorized personnel have access to your information and our systems and procedures are designed to prevent the loss, misuse, unauthorized access, disclosure, alteration, or destruction of your information. We retain your information only as long as is required for the purpose for which it was collected and for any regulatory requirements.

5. How we use your Information

First Rate WealthTech compiles client's databases containing basic business information. Organization uses an individual's personal and business information only for the purposes for which it was collected.

All employees and contractors engaged by First Rate WealthTech to perform work that involves access to personal/business information are contractually required to keep the information confidential and private and are not permitted to use it in any way other than what is necessary to perform their work for First Rate WealthTech.

First Rate WealthTech also reserves the right to share the information to respond to duly authorized information requests of governmental, regulatory and law enforcement in accordance with applicable law.

For product trials, we process the documents willingly uploaded by the potential clients using our proprietary applications or otherwise to analyze the data and provide desired output to the client. It may include spreading the statements and analyzing the summaries for analytics.

6. Data Security

First Rate WealthTech is committed to keeping our customers' personal data private and secure. First Rate WealthTech works hard to take reasonable precautions to protect our customer's personal information from loss, misuse or alteration. These precautions include limiting access to such information to authorized individuals only. Personal information is destroyed once it is determined it is of no use or outdated. Agents, contractors, or partners who have access to personal information are required to keep the information confidential and are not permitted to use this information for any other purpose than to carry out the services they are performing for Organization.

Information exchange between First Rate and First Rate's Clients is shared through a secured FTP, which is done through an Encrypted Site to Site VPN Tunnel. Information shared with First Rate is processed automatically and then reviewed for manual sign-off. Information is retained on First Rate system till the agreed SLA with clients and then gets deleted. First Rate does not share any information with 4th parties.

First Rate's current clients' customers do not interact directly with First Rate. Individuals (customers) do not have direct access to their personal data into First Rate environment. All requested changes for any personal record will be considered only after request generated and approved by our clients via a secure channel communication method (i.e. E-mail, Ticketing system or approvals)

7. Opt Out Choices

You can opt out of receiving future emails from First Rate WealthTech by following the unsubscribe procedures indicated in each email.

8. How long do we keep personal information for?

FRWT will only hold your personal information on the systems for the period necessary to fulfil the purpose outlined in the Policy, contract agreement with the client/customer or until you request that the information be deleted in accordance with your right to erasure.

Data Retention / Deletion: For Product Trial / DEMO submitted data, client has the option to softly delete the data. Clients can retain the data for a fixed number of days, and a choice can be made after uploading the documents. Data retention options are: 7 Days, 30 Days, 90 Days, 120 Days, Perpetual. Once the retention period is over (if opted), the application will delete the data as per the choice selected by the client. No confirmation emails will be sent. Client can verify by logging in to their account or by sending an email to First Rate.

First Rate WealthTech performs data collection, storage and processing on Azure servers hosted in the US. Most of the personally identifiable and financial information is stored in the database encrypted as per the organization's Information Security Policy. Documents uploaded by potential customers for product trial is stored in secured cloud storage, access to which is only to administrators and to the application which is encrypted. All required data is stored as well as transmitted using encryption (Data at Rest & Data in Transit).

9. How can you access, amend or take back the personal data that you've given to us?

You retain various rights in respect of your data, even once you have given it to us. These are described in more detail below:

- FRWT provides customers with an option to stop processing their personal information at any time.
- FRWT provides customers with an option to withdraw their consent.
- FRWT provides customers with an option to erase their personal information.
- opt out or delete the data, Customer can call on **+912035609245**
- number or by emailing us at **contact@firstratewealthtech.in**
- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We can respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the information relates to you.

10. Do not sell my personal information

FRWT will not sell your personal information. We maintain a separate web page that allows you to opt out of the sale of your personal information which can be accessed by sending email request with the details on: info@firstratewealthtech.in

11. Policy Changes

This Privacy Policy is effective as of 2023 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

First Rate WealthTech reserves the right to make changes to this Privacy Policy at any time so please check back periodically for our current Policy. If in the future First Rate WealthTech wish to use any business information in a manner not previously disclosed, Organization will post the policy changes here and if significant and will provide a more prominent notice to customers of these changes and provide the ability to opt-out.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

How to contact FRWT:

Registered office:

B1 Building Cerebrum IT Park, 7th Floor, Pune,
Maharashtra- 411014, India

info@firstratewealthtech.in

www.firstratewealthtech.in

Contact Number: +91 99234 52112

12. Acceptance of Privacy Practices

Acceptance of this Privacy Policy is signaled by either acquiring services from First Rate WealthTech or by using the organization's web site or interactive banner ads. By accepting this Policy, the customer agrees to adhere to the terms and conditions posted on the web site and contained herein. Visitors, callers, customers or potential customers that do not agree with any of these terms, should not use the services or submit any personal information to First Rate WealthTech.