

# YANIVA TRUST – Category II AIF

Managed by: YANIVA FUND MANAGERS LLP

## PRIVACY POLICY

Version 1.0 | Effective: May 2026 | SEBI Reg.: IN/AIF2/25-26/2061

This Privacy Policy is published in compliance with the Information Technology Act, 2000, the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 ("SPDI Rules"), SEBI (Alternative Investment Funds) Regulations, 2012, applicable SEBI circulars, and the Digital Personal Data Protection Act, 2023 ("DPDP Act") as applicable.

<b>Data Controller / Fiduciary</b>	YANIVA FUND MANAGERS LLP ("Investment Manager")
<b>Regulated by</b>	Securities and Exchange Board of India (SEBI), SEBI Reg. No.: IN/AIF2/25-26/2061
<b>Grievance Officer</b>	Varad Dave, Partner, VSD@YANIVA.CO.IN – Tel: +91-9106930955
<b>Governing Law</b>	Laws of India, jurisdiction of courts in Ahmedabad, India
<b>Policy Effective Date</b>	May 2026
<b>Last Updated</b>	May 2026

## 1. INTRODUCTION AND SCOPE

Yaniva Fund Managers LLP ("we," "us," "our," or "Investment Manager"), the SEBI-registered investment manager of YANIVA TRUST – Category II AIF ("Fund"), is committed to protecting the privacy and confidentiality of personal data of individuals who interact with us. This Privacy Policy ("Policy") applies to:

- Prospective investors and Contributors in the Fund;
- Existing Contributors and their authorized representatives;
- Visitors to our official website and digital platforms;
- Investee company directors, officers, and other counterparties;
- Employees, consultants, and other personnel.

This Policy does not apply to information that is publicly available or that has been legitimately obtained from other sources. This Policy should be read in conjunction with the Fund's PPM, which may contain additional confidentiality provisions applicable to Contributors.

## 2. CATEGORIES OF PERSONAL DATA COLLECTED

### 2.1 Identification and KYC Information

In compliance with SEBI's KYC (Know Your Customer) norms, Prevention of Money Laundering Act, 2002 ("PMLA"), and Foreign Exchange Management Act, 1999 ("FEMA") requirements, we collect:

- Full legal name, date of birth, nationality, and residential status;
- Government-issued identity documents (PAN, Aadhaar, Passport, Driving Licence);
- Proof of address documents;
- Photograph;
- Ultimate Beneficial Owner (UBO) details and declarations;
- FATCA / CRS self-certification and related information;
- Bank account details and cancelled cheque / bank statement;
- Demat account details (CDSL/NSDL).

## 2.2 Financial and Investment Information

- Net worth statements and income-related documents;
- Source of funds and source of wealth declarations;
- Investment amount, commitment, and drawdown history;
- Portfolio statements and performance reports provided to Contributors;
- Tax residency and tax identification numbers (for FATCA/CRS).

## 2.3 Sensitive Personal Data or Information (SPDI)

Under the SPDI Rules and the DPDP Act, the following categories of data may be collected and processed with explicit consent:

- Financial information (as above);
- Biometric data (where required under SEBI-mandated KYC processes through regulated KRAs);
- Medical information (only where specifically provided voluntarily for estate planning or succession-related purposes).

## 2.4 Technical and Usage Data (Website)

- IP address, browser type, operating system, and device information;
- Pages visited, time spent, and navigation patterns on our website;
- Cookies and similar tracking technologies (subject to consent where required).

## 3. PURPOSE AND LEGAL BASIS FOR PROCESSING

We process personal data for the following purposes, in compliance with applicable law:

Purpose	Legal Basis	Relevant Regulation
KYC verification and AML/CFT compliance	Legal obligation	PMLA 2002; SEBI KYC norms; FEMA 1999
Registration and onboarding of Contributors	Contractual necessity	AIF Regulations 2012; PPM
Management and administration of the Fund	Contractual necessity	AIF Regulations 2012

Purpose	Legal Basis	Relevant Regulation
Regulatory reporting (SEBI, RBI, FIU-IND, etc.)	Legal obligation	AIF Regulations; PMLA; FEMA
FATCA / CRS reporting	Legal obligation	Income Tax Act, 1961; OECD CRS
Sending investor reports (quarterly/annual)	Contractual / legitimate interest	AIF Regulations, Reg. 23
Grievance redressal	Legal obligation / legitimate interest	SEBI SCORES; AIF Regulations
Sending fund communications and notices	Contractual necessity / consent	PPM; Contribution Agreement
Due diligence on investee companies	Legitimate interest	AIF Regulations; Fiduciary duty
Website analytics and improvement	Legitimate interest / consent	IT Act 2000; DPDP Act 2023
Fraud prevention and risk management	Legal obligation / legitimate interest	AIF Regulations; PMLA

## 4. DATA SHARING AND DISCLOSURE

We do not sell, rent, or trade personal data. We may share personal data with:

### 4.1 Regulatory and Government Authorities

We are obligated to share personal data with regulatory, statutory, and government bodies including SEBI, the Financial Intelligence Unit – India (FIU-IND), the Reserve Bank of India (RBI), income tax authorities, and any other competent authority as required under applicable law. Such disclosure is mandatory and does not require additional consent.

### 4.2 Service Providers and Third Parties

We engage third-party service providers who process personal data on our behalf, including:

- Custodians (registered with SEBI);
- SEBI-registered KYC Registration Agencies (KRAs);
- Registrar and Transfer Agents (RTAs);
- Fund administrators and auditors;
- Legal and tax advisors bound by professional confidentiality obligations;
- IT service providers and cloud hosting entities.

All third-party processors are required to maintain appropriate technical and organisational security measures and to process data only for permitted purposes.

### 4.3 Co-investors and Deal Counterparties

With explicit consent or as necessary for execution of transactions, certain anonymised or aggregated data may be shared with co-investors. Identifiable personal data shall not be shared with investee companies or co-investors without consent, except to the extent required for regulatory or contractual compliance.

## 4.4 Cross-Border Transfers

In accordance with the DPDP Act, 2023, any transfer of personal data outside India shall be made only to countries notified by the Central Government, or subject to contractual safeguards ensuring equivalent protection. Contributor data required for FATCA/CRS purposes may be shared with overseas tax authorities through the prescribed channels under applicable intergovernmental agreements.

## 5. DATA RETENTION

We retain personal data for the period necessary to fulfil the purposes for which it was collected, and as required under applicable law:

<b>KYC and AML/CFT records</b>	5 years from the end of the business relationship (PMLA requirement)
<b>Contributor records and financial data</b>	8 years from the date of the last transaction (Income Tax Act)
<b>Regulatory filings and reports</b>	5 years from date of filing (as applicable)
<b>Fund accounting and audit records</b>	8 years from the end of the relevant financial year
<b>Website usage and analytics data</b>	Up to 12 months, unless required longer for legal proceedings
<b>Communications and correspondence</b>	5 years from the date of communication

## 6. DATA SECURITY

We implement reasonable security practices and procedures as mandated under the IT (Amendment) Act, 2008 and SPDI Rules, 2011, including:

- Encryption of data at rest and in transit;
- Role-based access controls limiting data access to authorised personnel on a need-to-know basis;
- Regular security audits and vulnerability assessments;
- Secure document management and destruction procedures;
- Incident response procedures for data breaches, including reporting obligations under the DPDP Act, 2023.

In the event of a personal data breach likely to result in harm, we shall notify the Data Protection Board of India (once operational) and affected individuals in accordance with the DPDP Act, 2023.

## 7. YOUR RIGHTS AS A DATA PRINCIPAL

Under the Digital Personal Data Protection Act, 2023 and applicable regulations, you have the following rights:

Your Right	How to Exercise
Right to Access	Request a summary of personal data we hold about you by contacting our Grievance Officer.
Right to Correction and Completion	Request correction of inaccurate or incomplete data.
Right to Erasure	Request deletion of data no longer necessary, subject to legal retention obligations.
Right to Grievance Redressal	File a complaint with our Grievance Officer (details below). Unresolved complaints may be escalated to the Data Protection Board of India.
Right to Nominate	Nominate another individual to exercise rights on your behalf in the event of death or incapacity.
Right to Withdraw Consent	Withdraw consent for processing based on consent, subject to consequences on services. Withdrawal does not affect lawful processing prior to withdrawal.

## 8. COOKIES AND WEBSITE TRACKING

Our website uses cookies to improve user experience and analyse website traffic. Cookies used include:

- Strictly necessary cookies – essential for the operation of the website;
- Analytics cookies – to understand how visitors interact with the website (e.g., Google Analytics);
- Functional cookies – to remember user preferences.

You may disable cookies through your browser settings. Disabling strictly necessary cookies may affect website functionality. By continuing to use our website, you consent to our use of cookies in accordance with this Policy.

## 9. INVESTOR GRIEVANCE REDRESSAL

For any privacy-related concerns, data access requests, or complaints, please contact:

### Grievance / Data Protection Officer

Name: Varad Dave

Designation: Partner

Address: 910, Swati Clover, Shilaj Circle, Shilaj, Ahmedabad, Gujarat, India - 380054

Email: [vsd@yaniva.co.in](mailto:vsd@yaniva.co.in)

Phone: +91-9106930955

Response Time: Acknowledgement within 48 hours; Resolution within 30 days.

If your complaint is not resolved to your satisfaction, you may escalate it to SEBI through the SEBI SCORES (SEBI Complaint Redress System) platform at <https://scores.sebi.gov.in>, or to the Data Protection Board of India once established under the DPDP Act, 2023.

## 10. AMENDMENTS TO THIS POLICY

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We reserve the right to update or amend this Privacy Policy from time to time to reflect changes in applicable law, regulatory guidance, or our data processing practices. The updated Policy will be published on our official website with the revised effective date. We encourage you to review this Policy periodically.

## 11. GOVERNING LAW

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This Policy is governed by and construed in accordance with the laws of India. Any disputes arising in relation to this Policy shall be subject to the exclusive jurisdiction of the courts in [City], India.

***Last Updated: May 2026***