

ARCINE RESEARCH LLP

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PRIVACY AND DATA PROTECTION POLICY

Arcnine Research LLP

Version: 1.0 | Effective Date: 15-02-2026

PRELIMINARY

This Privacy and Data Protection Policy (hereinafter referred to as the "**Policy**") is issued by Arcnine Research LLP, a limited liability partnership registered under the laws of India (hereinafter referred to as "**Arcnine**", "**the Firm**", "**we**", "**us**", or "**our**"). This Policy is published in compliance with the Digital Personal Data Protection Act, 2023 (hereinafter referred to as the "**DPDP Act**") and all other applicable laws, regulations, and regulatory guidelines as may be in force from time to time.

This Policy shall be read in conjunction with any other applicable terms, notices, or agreements governing the relationship between the Firm and any individual interacting with it.

SECTION 1 — OBJECT AND COMMITMENT

1.1 Arcnine is committed to upholding the privacy, dignity, and informational autonomy of all individuals with whom it may come into contact in the course of its operations.

1.2 The Firm recognises its obligations under applicable data protection legislation and affirms that its policies, procedures, and operational infrastructure are designed to be consistent with the principles of data minimisation, purpose limitation, and lawful processing as contemplated under the DPDP Act and allied statutory instruments.

1.3 This Policy is issued for the purpose of transparency and shall serve as the Firm's public representation of its data practices.

SECTION 2 — SCOPE AND APPLICABILITY

2.1 This Policy applies to and is binding in respect of all interactions with:

- (a) visitors to any website(s) maintained or operated by Arcnine;
- (b) business contacts, counterparties, professional correspondents, and any other external persons communicating with the Firm; and
- (c) any individual who transmits information to the Firm by electronic means or otherwise.

2.2 This Policy does not apply to information that is lawfully in the public domain or to anonymised or aggregated data that does not identify, and cannot reasonably be used to identify, any natural person.

SECTION 3 — NATURE OF DATA PROCESSING: NON-COLLECTION DECLARATION

3.1 Arcnine hereby declares, without qualification, that it does not collect, record, store, process, use, retain, transfer, disclose, profile, monitor, or otherwise deal with personal data of individuals in the ordinary course of its business operations.

3.2 Without prejudice to the generality of the foregoing, the Firm specifically confirms that:

(a) it does not maintain any database, register, file, ledger, or data system containing personal data of individuals;

(b) it does not collect names, residential or business addresses, telephone numbers, electronic mail addresses, identification or government-issued document numbers, financial particulars, biometric data, or any other information capable of identifying a natural person, whether directly or indirectly; and

(c) it does not engage in data analytics, behavioural tracking, individual profiling, or any form of automated surveillance directed at natural persons.

3.3 The business model and internal operational structure of the Firm are designed such that the processing of personal data is neither required nor incidental to the conduct of its commercial activities.

SECTION 4 — COMMUNICATIONS AND CORRESPONDENCE

4.1 Notwithstanding the declarations set out in Section 3 above, Arcnine acknowledges that it may, from time to time, receive inbound communications including but not limited to electronic mail messages, written inquiries, or other correspondence initiated by individuals of their own accord.

4.2 In respect of such communications, the Firm confirms that:

(a) any information contained therein shall be used solely and exclusively for the limited purpose of addressing and responding to the specific query or communication to which it relates;

(b) such information shall not be entered into any database, customer relationship management system, or archival repository;

(c) such information shall not be used for marketing, solicitation, commercial outreach, profiling, or any unsolicited follow-up communication; and

(d) such information shall not be retained beyond the period reasonably necessary to address the communication in question.

4.3 The Firm does not maintain mailing lists, contact directories, communication logs, or any repository of correspondent information.

SECTION 5 — WEBSITE OPERATIONS AND COOKIES

5.1 Any website(s) maintained or operated by Arcnine are designed and configured in a manner that:

(a) does not actively solicit or collect personal data from visitors;

(b) does not deploy cookies, web beacons, tracking pixels, session identifiers, or any analogous technology for the purpose of profiling, tracking, or monitoring user behaviour; and

(c) does not embed or integrate third-party analytics platforms, advertising networks, or behavioural monitoring tools.

5.2 The Firm acknowledges that standard web-hosting and server infrastructure may, by their inherent technical operation, transiently generate certain technical data such as Internet Protocol (IP) addresses or server access logs. The Firm confirms that:

(a) such data is non-identifiable in character and does not constitute personal data for the purposes of the DPDP Act;

(b) such data is transient in nature and is automatically overwritten or discarded in the normal course of server operations; and

(c) such data is not accessed, retained, analysed, or utilised by the Firm for any purpose whatsoever.

SECTION 6 — DISCLOSURE TO THIRD PARTIES

6.1 As a direct consequence of the Firm's non-collection position affirmed in Section 3, no personal data is available for disclosure to any third party.

6.2 For the avoidance of doubt, the Firm expressly confirms that:

(a) no personal data is shared, disclosed, transferred, licensed, sold, assigned, or otherwise made available to any third party;

(b) no personal data is transmitted to affiliates, subsidiaries, holding entities, vendors, consultants, service providers, legal advisors, or any other external entity; and

(c) no cross-border transfer of personal data, whether to a trusted country notified under the DPDP Act or otherwise, is affected by the Firm.

SECTION 7 — INFORMATION SECURITY AND SAFEGUARDS

7.1 As the Firm does not process or retain personal data, the risks conventionally associated with unauthorised access, misuse, accidental loss, or data breaches do not arise within Arcnine's systems or infrastructure.

7.2 Notwithstanding the foregoing, and in recognition of generally accepted best practices in information security, Arcnine maintains appropriate administrative and technical controls including:

- (a) secure communication infrastructure and encrypted transmission protocols;
 - (b) restricted internal access to systems, networks, and operational resources; and
 - (c) compliance with prevailing information security standards and practices as are reasonably applicable to its operational context.
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SECTION 8 — RETENTION OF INFORMATION

8.1 Arcnine does not retain personal data in any form, whether in physical, electronic, or any other medium.

8.2 Any information that may be incidentally received in the course of a specific communication shall not be stored, archived, catalogued, or preserved beyond what is strictly and necessarily required to address that particular interaction.

SECTION 9 — RIGHTS OF DATA PRINCIPALS

9.1 As Arcnine does not collect, store, or otherwise process personal data, the exercise of rights available to data principals under the DPDP Act — including rights of access, correction, erasure, portability, grievance redressal, or restriction of processing — does not ordinarily arise in the context of interactions with the Firm.

9.2 The Firm further confirms that it does not engage in automated decision-making, algorithmic profiling, or any processing that may have a legal or significant effect on any natural person.

9.3 Notwithstanding the above, if any individual is of the reasonable belief that personal data pertaining to them has been inadvertently received or retained by the Firm, such individual is encouraged to contact Arcnine without delay using the particulars set out in

Section 10 below, and the Firm shall endeavour to address such concern promptly and in good faith.

SECTION 10 — GRIEVANCE AND CONTACT

10.1 All queries, concerns, complaints, or requests for clarification relating to this Policy or to any privacy-related matter concerning the Firm's operations may be directed to:

Arcnine Research LLP

Mail: policy@arcnine-research.com

10.2 The Firm shall endeavour to acknowledge and respond to all such communications within a reasonable time.

SECTION 11 — AMENDMENTS AND UPDATES

11.1 Arcnine reserves the right to review, amend, or update this Policy at any time, including in response to changes in applicable law, regulatory guidance, judicial interpretation, or the Firm's own operational requirements.

11.2 Any revised or updated version of this Policy shall supersede all prior versions and shall take effect from the date of its publication on the Firm's official website or communication channels, unless a later effective date is expressly specified therein.

11.3 Individuals are encouraged to review this Policy periodically to remain informed of the Firm's current practices.
