PRIVACY POLICY

Rehan Ahmed Zubairahmed Shaikh
Individual SEBI Registered Research Analyst — INH000027201
Operating through the platform Barkat Capital (www.barkatcapital.com)

Effective Date: May 18, 2026
Last Updated: May 18, 2026

About this Policy

This Privacy Policy is issued by Rehan Ahmed Zubairahmed Shaikh, an individual SEBI Registered Research Analyst, who operates the website and platform known as Barkat Capital (www.barkatcapital.com). References to "we", "us", "our", or "the Research Analyst" in this Policy mean Rehan Ahmed Zubairahmed Shaikh personally. References to "Barkat Capital" mean the brand name and website through which the Research Analyst offers his services.

Important: Barkat Capital is not a separate firm, company, partnership, or legal entity. It is only a brand/platform name. The SEBI registration and all legal obligations attach to Rehan Ahmed Zubairahmed Shaikh, individually.

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1. Introduction

Rehan Ahmed Zubairahmed Shaikh ("we", "us", "our", "the Research Analyst") is committed to protecting the privacy and personal data of every individual who interacts with us through www.barkatcapital.com (the "Website") or avails our research services.

This Privacy Policy explains how we collect, use, store, share, and protect your personal information in accordance with:

- **The Digital Personal Data Protection Act, 2023 ("DPDP Act")**
- **The Information Technology Act, 2000 and rules thereunder**
- **SEBI (Research Analysts) Regulations, 2014**
- **SEBI circulars on KYC and client onboarding**

By accessing our Website, registering, or availing any service, you consent to the practices described in this Policy.

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2. Information We Collect

2.1 Information You Provide Directly

- **Identity Data: Name, date of birth, gender**
- **Contact Data: Phone number, email address, postal address, WhatsApp number**
- **KYC Data: PAN, Aadhaar (for eSign), photograph, signature**
- **Financial Data: Bank account details (for refunds only), payment transaction references**

- **Professional Data: Occupation, annual income range, trading experience (for risk profiling)**
- **Account Data: User ID, encrypted password, credit balance, service subscriptions**
- **Communication Data: Queries, complaints, feedback, chat messages with BarkatBot**

2.2 Information Collected Automatically

- **IP address, browser type, device information**
- **Login timestamps, session logs**
- **Pages visited, features used, screener queries**
- **Cookies and similar tracking technologies**

2.3 Information from Third Parties

- **Payment gateway confirmations (UPI/NEFT/RTGS status)**
- **eSign service provider (Aadhaar eSign audit trail)**
- **KYC verification agencies (PAN validation)**

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3. Purpose of Collection and Usage

We collect and process your data for the following purposes:

Purpose	Legal Basis
To register you as a user and create your account	Contractual necessity
To complete KYC and eSign as mandated by SEBI	Legal obligation
To provide the services you have subscribed to	Contractual necessity
To process payments and issue invoices	Contractual necessity
To allocate and track screener credits	Contractual necessity
To send research reports, signals, and updates	Contractual necessity
To send newsletters, surveys, and promotional content	Consent
To respond to your queries and complaints	Legitimate interest

Purpose	Legal Basis
To comply with regulatory, tax, and audit requirements	Legal obligation
To improve our services and user experience	Legitimate interest
To detect and prevent fraud or misuse	Legitimate interest

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4. Communication Consent

By submitting an inquiry form, registering on the Website, or reaching out to us via any channel (email, phone, WhatsApp, social media), you authorize us to contact you through:

- **Phone calls**
- **SMS**
- **Email**
- **WhatsApp**

This consent applies even if your number is registered under the National Do Not Disturb (DND) registry, as permitted for service-related and transactional communication.

You may withdraw this consent for promotional communication at any time (see Section 10).

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5. Payment Data

- **All payments are processed through PCI-DSS compliant payment gateways.**
- **We do not store your full card number, CVV, UPI PIN, or net banking credentials.**
- **We store only: transaction reference number, amount, date, and payment status.**
- **The ₹100 platform fee and subscription payments are recorded for accounting, refund, and audit purposes.**

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6. Credits System Data

- **We maintain records of your screener credit balance, including:**
    - **Free credits (100, valid for 30 days from registration)**
    - **Subscription credits (100, valid for 365 days)**
    - **Purchased top-up credits (valid for 365 days)**
    - **Credit usage history (date, time, screener query)**

    - **Credit expiry dates**
- **Credits are non-refundable, non-transferable, and cannot be exchanged for cash.**
- **Expired credits cannot be restored or refunded.**

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7. eSign and KYC Data

- **Your Aadhaar eSign is executed through a SEBI-compliant eSign service provider.**
- **We store:**
    - **Signed agreement PDF**
    - **eSign audit trail (timestamp, IP, authentication reference)**
    - **KYC documents (PAN, address proof)**
- **Retention: KYC records and signed agreements are retained for a minimum of 5 years after the end of the client relationship, as mandated by SEBI and PMLA.**

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8. Disclosure to Third Parties

We do not sell, rent, or trade your personal information.

We may share data only with:

- **Regulatory authorities (SEBI, BSE, tax authorities) when legally required**
- **Service providers (payment gateways, eSign providers, KYC agencies, cloud hosting) under strict confidentiality agreements**
- **Law enforcement when required by law**
- **Professional advisors (auditors, legal counsel) under confidentiality**

All third-party service providers are contractually bound to protect your data and use it only for the specified purpose.

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9. Data Security

We implement reasonable technical and organizational measures to protect your data, including:

- **Encryption of data in transit (HTTPS/TLS) and at rest**
- **Access controls with role-based permissions**
- **Secure password storage using hashing algorithms**
- **Regular backups and disaster recovery**
- **Employee/associate confidentiality agreements**
- **Audit logs of data access**

Data Breach Notification: In the event of a personal data breach, we will notify affected users and the Data Protection Board of India as required under the DPDP Act.

While we take reasonable precautions, no system is 100% secure. We cannot guarantee absolute security.

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10. Your Rights as a Data Principal

Under the DPDP Act, 2023, you have the right to:

1. **Access — Request a copy of your personal data**
2. **Correction — Request correction of inaccurate or incomplete data**
3. **Erasure — Request deletion of data (subject to SEBI's 5-year retention requirement)**
4. **Grievance Redressal — Lodge a complaint with our Grievance Officer**
5. **Nominate — Nominate another person to exercise your rights in case of death or incapacity**
6. **Withdraw Consent — Withdraw consent for promotional communication**

To exercise any right, email rehan@barkatcapital.com with the subject line "Data Principal Request."

We will respond within 30 days as required under the DPDP Act.

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11. Opt-Out Option

If you wish to stop receiving promotional or marketing communication:

- **Email rehan@barkatcapital.com with the subject "Unsubscribe"**
- **Your preferences will be updated within 7 working days**

Note: Transactional and service-related communication (reports, signals, KYC, billing) cannot be opted out of while your subscription is active, as it is essential for service delivery.

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12. Data Retention

Data Type	Retention Period
KYC records and signed agreements	5 years after end of relationship (SEBI mandate)
Research reports and communication	5 years
Payment and invoice records	8 years (tax requirement)

Data Type	Retention Period
Account data (post-closure)	1 year
Credit usage logs	2 years
Marketing consent records	Until withdrawn + 1 year

After the retention period, data is securely deleted or anonymized.

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13. Cookies

Our Website uses cookies to:

- **Keep you logged in**
- **Remember your preferences**
- **Analyze site traffic**
- **Improve user experience**

You can disable cookies in your browser settings, but some features may not work properly.

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14. Children's Privacy

Our services are not intended for individuals under 18 years of age. We do not knowingly collect data from minors. If we discover such data, we will delete it promptly.

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15. Grievance Officer

As required under the DPDP Act, 2023 and IT Rules, 2011:

Name: Rehan Ahmed Zubairahmed Shaikh
Designation: Grievance Officer
Email: rehan@barkatcapital.com
Phone: +91 9824166116
Working Hours: Monday–Friday, 10:00 AM – 6:00 PM
Address: 13 Gulzar Row House, Opposite Sultaniya Gymkhana, New Rander Road, Gorat, Rander, Surat – 395005, Gujarat

Response Timeline: Acknowledgement within 48 hours; resolution within 30 days.

For unresolved grievances, you may escalate to:

- **SEBI SCORES: https://scores.sebi.gov.in**
- **Data Protection Board of India (for DPDP matters)**

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16. Policy Modifications

We may update this Privacy Policy from time to time to reflect changes in law, technology, or business practices. Updated versions will be posted on the Website with a revised "Last Updated" date. Continued use of our services implies acceptance.

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17. Contact Information

Rehan Ahmed Zubairahmed Shaikh
Individual SEBI Registered Research Analyst — INH000027201
Operating through the platform Barkat Capital
Registered Office: 13 Gulzar Row House, Opposite Sultaniya Gymkhana, New Rander Road, Gorat, Rander, Surat – 395005, Gujarat
Phone: +91 9824166116
Email: rehan@barkatcapital.com
Website: www.barkatcapital.com

This Privacy Policy is governed by the laws of India. Any disputes shall be subject to the exclusive jurisdiction of courts in Surat, Gujarat.