BUILDING BONDS

A. K. CAPITAL SERVICES LIMITED

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INVESTOR GRIEVANCE REDRESSAL MECHANISM UNDER

DIGITAL PERSONAL DATA PROTECTION ACT, 2023

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1. **INTRODUCTION**

This Policy is framed in accordance with the provisions of the Digital Personal Data Protection Act, 2023 ("DPDP Act") and read with Digital Personal Data Protection Rules, 2025 ("DPDP Rules") is intended to establish a transparent, efficient and time-bound mechanism for addressing grievances raised by Data Principals with respect to the processing of their Personal Data as received by the Company.

A.K. Capital Services Limited (the "Company") in its capacity as Data Fiduciary is committed to processing personal data in a lawful, fair and secure manner while respecting the rights of Data Principals in accordance with applicable provisions of Section 13 of the DPDP Act.

2. **OBJECTIVE**

This mechanism applies to grievances relating to Personal Data processed by the Company.

The DPDP Act mandates the Company in its position as a Data Fiduciary obtaining and processing Personal Data to establish an effective mechanism to redress the grievances of individual to whom the personal data relates.

3. **DEFINITIONS**

(a) **Complainants**: shall mean investors, clients, employees, vendors and other Data Principals whose Personal Data for the purpose of processing is obtained by the Company, raises Complaint(s) / Grievance(s) under this mechanism.

(b) **Complaint or Grievance:** A Complaint or Grievance means any expression of dissatisfaction made by Data Principal / Complaints in respect of any act or omission by the Company in relation to Personal Data of Data Principal or the exercise of rights available to Data Principal under the provisions of the Act and rules made thereunder.

(c) **Data Fiduciary:** means any person who alone or in conjunction with other persons determines the purpose and means of processing of personal data.

(d) **Data Principal**: means the individual to whom the personal data relates and where such individual is—
   (i) a child, includes the parents or lawful guardian of such a child; and
   (ii) a person with disability, includes her lawful guardian, acting on her behalf.

(e) **Personal data** means any data about an individual who is identifiable by or in relation to such data.

Any term(s) and, or expression(s) not defined in this policy shall have the same meaning as defined in the applicable provisions of the DPDP Act read with DPDP Rules.

Wherever appropriate in this policy, a singular term shall be construed to mean the plural where necessary and a plural term the singular. Similarly, any masculine term shall also be construed to mean the feminine or any other gender and vice versa.

4. RIGHTS OF DATA PRINCIPAL

Data Principal shall have the right to access, correct or update any inaccuracies in their personal data, request erasure or deletion, where legally permissible, withdraw their consent (without affecting lawful prior processing), and nominate another person to exercise their rights.

5. GRIEVANCE RESOLUTION PROCESS

(a) The Grievance Redressal Officer shall examine the Grievance and may seek additional information or clarification from the Data Principal, wherever required.

(b) In case the resolution of Complaint requires inputs/ responses from any other department(s) of the Company the Compliance Officer shall share the details of the Complaint received and seek the necessary inputs/ responses from the concerned department(s).

(c) The Grievance Redressal Officer shall review and provide the optimal resolution representing the Company's best attempt to address the Grievance within a period of 90 days from the date of its receipt.

(d) Resolution may include corrective actions in the form of clarification, providing access, correction and/ or erasure of incorrect data, or other appropriate remedial measures.

(e) In accordance with Section 13(3) of the DPDP Act, the Data Principal shall exhaust the grievance redressal mechanism provided by the Company before approaching the Data Protection Board of India.

(f) If the Data Principal is not satisfied with the resolution or no response is received within the prescribed time, he/ she may escalate the grievance to the Data Protection Board of India in the manner provided under the DPDP Act.

6. MODE OF SUBMISSION

The Company has designated Compliance Officer of the Company as Grievance Redressal Officer with below co-ordinates to address such Complaints /Grievances as defined under this Mechanism.

Email Address	dpdp.akcslgrievance@akgroup.co.in
Address	603, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (East), Mumbai - 400 098

Complaint or Grievance can be lodged by submitting a duly filled 'Grievance Form' in the format setout in "Annexure-I" hereto, and forwarding the same to the Grievance Redressal Officer on the contact details given above.

7. **REVIEW/ AMENDMENT OF POLICY**

The Board may amend this policy as and when deemed fit. The Company shall reserve the right to review and make amendment(s) to this policy from time to time as it deems fit in accordance with the applicable laws, DPDP Act, DPDP Rules and other regulations/ directions/ rules for the time being in force. In the event of any conflict between the provisions of this policy and the DPDP Act or DPDP Rules or any other statutory enactments, the provisions of DPDP Act or DPDP Rules or statutory enactments shall prevail over this Mechanism. An interim review and amendment can also be carried out to accommodate minor changes, if any, on regulatory and operating front by the Compliance Officer of the Company.

ANNEXURE I - GRIEVANCE FORM UNDER DPDP ACT

Name of the Data Principal	
Permanent Account Number ("PAN")	
Communication address	
Mobile Number	
Email Address	
Details about the Complaint/ Grievance	
Type of request (access, correction, erasure, etc.)	
Attachments, if any	

Note:

1. All the fields are mandatory, until specified otherwise

2. The Company shall promptly respond to the Complainant confirming the receipt of Grievance/ Compliant