Privacy Policy - Groww Asset Management Limited

Last Updated: Oct 30, 2026

Groww Asset Management Limited, (CIN U65991KA2008PLC180894), a public limited company having its registered office at Vaishnavi Tech Park, South Tower, 3rd Floor, Survey No.16/1 and 17/2, Ambalipura Village, Varthur Hobli, Bellandur, Bangalore South, Karnataka - 560103, India (hereinafter referred to as "Company", "We", "Us" or "Our" which expression shall include its affiliates, successors and assigns). The Company is the developer and owns and operates the website Invest in Groww Mutual Fund - Growwmf (referred to as the "Website"). "You" and "Your" shall mean anyone who visits, accesses, or uses the Website or obtains Services (defined below) from Us through the Website. We are committed to protecting Your privacy and the personal information You share with Us while using and operating the Website. We value the trust You place in Us and thus We maintain the highest security standards for securing the transactions and Your information.

We may also allow Our group companies and affiliates to use Our Website to offer their products and services to You, under applicable terms and conditions as may be specified on Our Website, and as updated from time to time.

This privacy policy ("Privacy Policy") specifies the manner in which personal data and other information are collected, received, stored, processed, disclosed, transferred, dealt with or otherwise handled by the Company. This Privacy Policy does not apply to information that You provide to, or that is collected by, any third-party (excluding the group companies and affiliates) through the Website, and any third-party sites that You access or use in connection with the services offered on the Website.

Please read the Privacy Policy carefully prior to using or registering on the Website or accessing/availing the services made available on the Website including *interalia* in relation to issuance of mutual funds and mutual fund distribution ("Services").

By accessing the Website and/or using the Services, You accept and agree to be bound by the terms and conditions of this Privacy Policy. This Privacy Policy is incorporated into and shall be subject to the Terms & Conditions of the Website ("Terms"). The Privacy Policy shall be read harmoniously and in conjunction with the Terms.

This Privacy Policy (i) is an electronic record under the Information Technology Act, 2000 read with rules and regulations made thereunder and is generated by a computer system; and (ii) will not require any physical, electronic, or digital signature.

In case of any non-compliance of the Privacy Policy by You or any of your representatives, We shall have the right to terminate Your access to the Services or any part thereof or Your usage rights to the Website immediately or remove non-compliant information or both, as the case may be.

1. Collection of Information

We may collect Personal Information, Transaction Information and Non-Personal Information (*defined below*) from You when You register or set up an account with Us on the Website or when You avail the Services. You can browse certain sections of the Website without being a registered member, however, to avail Services on the Website (such as investing in Mutual funds) You are required to register with Us.

This Privacy Policy applies to the following information:

- Information You provide Us: You may provide certain information to Us voluntarily while registering on Our Website or for using Our Services. Such information includes any identification/ correspondence details including ●Your mobile number, email address, password, date of birth, gender, Permanent Account Number (PAN), signature, marital status, nominee details, residential/ current address, any national identifiers such as identity card / passport details / Aadhaar card details / Voter ID / driving license, and/or education details. We may also ask You to provide certain additional information about You or any person acting on Your behalf on a case-to-case basis (collectively "Personal Information"). Further, You hereby acknowledge and agree that Our affiliates or group companies registered with financial services regulators may retrieve from Your records available with third party including from Know Your Customer (KYC) Registration Agency (KRA) such as name, KYC details, KYC status, father's name, occupation, address details and related documents.
- Transactional Information: We may also ask You for certain financial information, including Your billing address, bank account details, income, expenses, including transaction history, folio details, and/or other payment related details or other payment method data, and debit instructions or other standing instructions to process payments for the Services. Further, if You choose to invest through the Website, We will also collect information about Your transactions including transaction status/ ID and details and Your investing patterns and behaviour (collectively "Transaction Information").
- Non-Personal Information and Cookies: We may also collect certain Non-Personal Information, such as Your internet protocol address, web request, operating system, browser type, URL, internet service provider, IP address, aggregate user data, browser type, software and hardware attributes, pages You request, and cookie information, etc., which will not identify with You specifically ("Non – Personal Information"), while You browse, access or use the Website. We receive and store Non – Personal Information, using data collection devices such as "cookies" on certain pages of the Website, in order to help and analyze Our web – page flow, track user trends, measure promotional effectiveness, and promote trust and safety. We offer certain additional features on the Website that are only available through the use of a "cookie". We place both permanent and temporary cookies in Your computer's hard drive. We also use cookies to allow You to enter Your password less frequently during a session on the Website. Most cookies are "session cookies," meaning that they are automatically deleted from Your hard drive at the end of a session. You are always free to decline Our cookies if Your browser permits, although in that case, You may not be able to use certain features or Services being provided on the Website or You may be required to re-enter Your password each time you log – in or access the Website during a session. No Personal Data will be collected via cookies and other tracking technology; however, if You previously provided Personal Data, cookies may be tied to such information. When and if You use the Website through Your mobile device, We may receive information about Your

location, Your IP address, and/or Your mobile device, including a unique identifier number for Your device. You can withdraw Your consent at any time by disabling the location-tracking functions on Your mobile. You acknowledge and agree that when You browse the Website without being a registered member or without providing Your Personal Information, We may still collect and store Your Non-Personal Information.

- User Communications: If You choose to post messages on our message boards, chat rooms or other message areas or leave feedback or if You send us correspondence, such as emails or letters, or if other users or third parties send us correspondence about Your activities or postings on the Website ("User Communications"), We will collect and store such information You provide to Us. We retain this information as necessary to resolve disputes, provide customer support, respond to queries and inquiries, and troubleshoot problems and improve the Services. Any communication, post, comment or correspondences made by You while making use of Our Website or availing the Services including but not limited to providing any general feedback or any communication with our customer service executive including any integrated artificial intelligence feature offered by the Website/ chatbot may be collected by us and retained as per the terms of this Privacy Policy.

- All information disclosed by You including but not limited to Your Personal Information, Non-Personal Information, User Information and Transaction Information shall be deemed to be disclosed willingly and without any coercion. No liability pertaining to the authenticity/genuineness/misrepresentation etc. of Your Personal provided to Us or with regard to any fraud or negligence thereof shall lie on the Company nor will the Company be in any way responsible to verify any information obtained from You. All information disclosed by You including all collected by the Company shall be stored on servers, log files and any other storage system owned by the Company or by third parties in India. Our primary goal in doing so is to provide You a safe, efficient, smooth and customized experience on the Website. The information collected by Us allows Us to provide the Services and features on the Website that most likely meet Your needs, and to customize the Website to make Your experience safer and easier.

Wherever possible, while providing the information to Us, We indicate which fields are mandatory and which fields are optional for You. You always have the option to not provide the Personal Information to Us through the Website by choosing to not use the Services or feature being provided by Us on the Website, which requires You to provide such information.

2. Use of Your Information

We use the Personal Information, Non-Personal Information, Transactional Information and User Communications and such other information provided by You for the following: (i) to provide and improve the Services on the Website that You request; (ii) to resolve disputes and troubleshoot problems; (iii) to help promote a safe service on the Website and protect the security and integrity of the Website, the Services and the users; (iv) collect money from You in relation to the Services, (v) inform You about online and offline offers, products, services, and updates; (vi) customize Your experience on the Website; (vii) to detect, prevent and protect Us from any errors, fraud and other criminal or prohibited activity on the Website; (viii) enforce and inform about our terms and conditions; (ix) to process and fulfil Your request for Services or respond to Your comments, and

queries on the Website; (x) to contact You; (xi) to allow Our business partners and/or associates to present customised messages to You; (xii) to communicate important notices or changes in the Services, use of the Website and the terms/policies which govern the relationship between You and the Company and with Our affiliates for providing Services to You; and (xiii) for any other purpose after obtaining Your consent at the time of collection.

You hereby specifically agree and provide Your consent thereby enabling Us and/or our group companies, affiliates to collect, store, transfer, process and share information (including Personal Information) related to You with third parties such as [●], including regulatory, governmental and other relevant statutory authorities such as Securities and Exchange Board of India, AMFI, Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI)/payment gateways/collecting banks/KRAs etc., solely for the purpose of reviewing your profile and processing your transaction requests for the Services or for other products/services offered by us or our group companies and affiliates.

We may automatically track certain information about You based upon Your behaviour on the Website. We use this information to do internal research on Your demographics, interests, and behaviour to better understand, protect and serve You. This information is compiled and analysed by the Company on an aggregated basis and not individually, in a manner that does not specifically identify You.

In addition to the above, We identify and use Your IP address to help diagnose problems with Our server, resolve such problems and administer the Website. Your IP address is also used to help identify you and to gather broad demographic information.

We may occasionally ask You to complete optional online surveys. These surveys may ask You for Your contact information and demographic information like zip code, age, or income level. We use this information to tailor Your experience at the Platform, providing You with content that We think You might be interested in and to display content according to Your preferences. We use Your Personal Information to send You promotional emails, however, We will provide You the ability to opt-out of receiving such emails from Us. If You opt out, the Company may still send You non-promotional emails, such as emails about the Services and Your account on the Website.

Unless and until, You explicitly give Your consent to Us, to do so, We will not share Your Personal Information with another user of the Website and vice versa.

Upon closure of Your account, We are not obligated to retain any data provided by You, and We reserve the right to delete all such data without assuming liability. Nevertheless, We may opt to retain the provided data if We deem it necessary to prevent fraud or future abuse, or if mandated by law, or for any other legitimate purposes.

Use of information received by the Company and/or its affiliates from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

3. Sharing of information

We may make Your Personal Information, Non-Personal Information, Transaction Information, User Communications and/or other information available to Our group companies and affiliates to enable providing You Services through the Website. Please note that all information shared with Our group companies and affiliates or made available to Our group companies and affiliates will be governed by this Privacy Policy. In addition to the Personal Information and in order to provide Services to You, the Company may also collect Your Aadhaar, fingerprint and signature, solely for completing the account opening procedures and authenticating Your transactions on the Website. The act of providing Your Aadhaar is voluntary in nature and the Company, hereby agrees and acknowledges that the Company will collect, use and store such details in compliance with applicable laws and this Privacy Policy.

We may also disclose Your Personal Information, to third party vendors, consultants, data processors, attorneys, accountants, auditors and persons or entities that assess Our compliance with industry standards, authorized external third parties who are involved in transaction processing and other service providers of the Company, who are bound by contractual obligations to keep such Personal Information confidential and use it only for the purposes for which We disclose it to them and You hereby give Your consent for the same. This disclosure may be required for Us, for instance, to provide You access to Our Services and process payments including validation of Your bank accounts, to facilitate and assist Our marketing and advertising activities/initiatives, for undertaking auditing or data analysis, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to Our Services.

We may also disclose Your Personal Information, to statutory and regulatory bodies and authorities including but not limited to the Securities and Exchange Board of India and law enforcement authorities and entities or persons, to whom or before whom it is mandatory to disclose the personal data as per the applicable law, courts, judicial and quasi-judicial authorities and tribunals, arbitrators and arbitration tribunals.

You hereby specifically agree and provide Your consent thereby enabling Us and/ or Our group/associate/affiliate companies to access, store, transfer, process your SMS data for the purpose of reviewing your profile or undertaking internal evaluation and analysis.

The Company may disclose Your information, to the extent necessary: (i) to comply with laws and to respond to lawful requests and legal process, (ii) to protect the rights and property of the Company, Our users, and others, including to enforce the Terms, and (iii) in an emergency to protect the personal safety and assets of the Company, the users, or any person. In such an event the Company is in no manner responsible for informing You or seeking Your approval or consent.

We and Our group companies and affiliates (to the extent Personal Information is collected by them) may, in compliance with applicable laws, share/transfer/assign all of Your Personal Information and other information with any other business entity(ies), in the event of a merger, sale, re-organization, amalgamation, joint ventures, assignment, restructuring of business or transfer or disposition of all or any portion of Our business.

4. Connecting your email account

You hereby choose to provide Your explicit consent to connect/integrate Your email account(s) with Your account on the Website by clicking on the authentication email sent by the Company on Your registered email address. You will be expressly asked in each case whether You want to connect Your email address with Your account on the Website. You can also choose to enable Our access to one or more of Your email accounts by connecting such account(s) with Your account on the Website.

Such data obtained by this integration will be used by the Company solely for providing the Services and improving Your experience of the features of the Website and to consolidate your investment details and history. The Company hereby agrees and acknowledges that it shall not use or transfer any data or information received from the integration of the email addresses with the account on the Website to third parties for serving ads, including retargeting, personalized, or interest-based advertising.

We encourage You to review the information prior to giving Your consent for integration of the email addresses with the account on the Website. You may at any time opt to de-link Your email addresses connected with the account opened on the Website, by managing these connections with the options provided on the Website.

5. Links to Other Third – Party Sites and collection of information

Our Website may link You to other third – party websites ("Third – Party Sites") that may collect Your Personal Information including Your IP address, browser specification, or operating system. The Company is not in any manner responsible for the security of such information or their privacy practices or content of those Third – Party Sites. Additionally, You may also encounter "cookies" or other similar devices on certain pages of the Third – Party Sites and it is hereby clarified by the Company that the Website does not control the use of cookies by these Third – Party Sites. These third-party service providers and Third-Party Sites may have their own privacy policies governing the storage and retention of Your information that You may be subject to. This Privacy Policy does not govern any information provided to, stored on, or used by these third-party providers and Third-Party Sites. We recommend that when You enter a Third-Party Site, You review the Third Party Site's privacy policy as it relates to safeguarding of Your information. These companies may use information (not including Your name, address, email address, or telephone number) about Your visits to the Website and Third-Party Sites in order to provide advertisements about goods and services of interest to You. You agree and acknowledge that We are not liable for the information published in search results or by any Third-Party Sites.

6. Security Precautions and measures

Our Website has reasonable security measures and safeguards in place to protect Your privacy and Personal Information from loss, misuse, unauthorized access, disclosure, destruction, and alteration of the information in compliance with applicable laws. Further, whenever You access Your account on the Website or any information relating to it, We offer the use of a secure server. We cannot however ensure or warrant the security of any information You transmit to the Company or guarantee that Your Personal Information and/or other Non-Personal Information provided for availing the Services or accessing the Website will not be accessed, disclosed, altered or destroyed by a breach of any of Our security measures and safeguards. It is further clarified that You have, so long as You access and/or

use the Website (directly or indirectly), the obligation to ensure that You shall, at all times, take adequate physical, managerial, and technical safeguards, at Your end, to preserve the integrity and security of Your data which shall include and not be limited to Your Personal Information.

When Transaction Information is being transmitted on or through the Website, it will be protected by encryption technology. You expressly consent to the sharing of Your information with third party service providers, including payment gateways, to process payments and manage your payment-related information. We take various steps and measures to protect the security of your information from misuse, loss, unauthorised access, modification or disclosure. We use the latest secure server layers encryption and access control on our systems. Please do not share your Account's login, password, OTP details or credentials with anybody.

While We observe reasonable security measures to protect Your Personal Information on Our Website, security risks may still arise for reasons outside of our control such as hacking, virus dissemination, force majeure events, breach of firewall etc. Please note that the above mentioned measures do not guarantee absolute protection to the Personal Information. The Company assumes no liability or responsibility for disclosure of Your information due to errors in transmission, unauthorized third-party access, or other causes beyond its control. You play an important role in keeping Your Personal Information secure. You shall not share Your Personal Information or other security information for Your account with anyone. The Company has undertaken reasonable measures to protect Your rights of privacy with respect to Your usage of the Website controlled by Us and Our Services. However, We shall not be liable for any unauthorized or unlawful disclosures of Your Personal Information made by any third parties who are not subject to Our control.

You agree to notify us immediately in case of any unauthorized or illegal access/ use of your account or any breach of security arising due to your action/ inaction. We shall notify you and/or the appropriate authority in case of any breach of security, data at our end and in accordance with such timelines as may be prescribed under applicable law(s).

This Privacy Policy and the security controls and practices implemented by Us to Protect Your Personal Information shall be the reasonable security practices and procedures under section 43A of the Information Technology Act, 2000.

You shall not host, display, upload, modify, publish, transmit, store, update or share any information that:

- belongs to another person and to which You do not have any right.
- is obscene, pornographic, paedophilic, invasive of another's privacy including bodily privacy, insulting or harassing on the basis of gender, racially or ethnically objectionable, relating or encouraging money laundering or gambling, or promoting enmity between different groups on the grounds of religion or caste with the intent to incite violence.
- is harmful to child.
- infringes any patent, trademark, copyright or other proprietary rights.

- deceives or misleads the addressee about the origin of the message or knowingly and intentionally communicates any misinformation or information which is patently false and untrue or misleading in nature.
- impersonates another person.
- threatens the unity, integrity, defence, security or sovereignty of India, friendly relations with foreign States, or public order, or causes incitement to the commission of any cognizable offence, or prevents investigation of any offence, or is insulting other nation.
- contains software virus or any other computer code, file or program designed to interrupt, destroy or limit the functionality of any computer resource.
- violates any law for the time being in force.

7. Your Consent and Changes to Privacy Policy

Your Consent: By visiting the Website or setting up/creating an account on the Website for availing the Services on the Website at such time, You signify Your acceptance to the provisions of the Privacy Policy.

Withdrawal of consent: You may choose to withdraw Your consent/delete your information provided hereunder at any point in time. Such withdrawal of consent/account deletion must be sent in writing to support@growwmf.in. In case You do not provide Your consent or later withdraw Your consent, We may request you not to access the Website and/or use the Services and also reserve the right to not provide You any Services through the Website. In such a scenario, the Company may delete Your information (Personal or otherwise) or de-identify it so that it is anonymous and not attributable to You. Notwithstanding anything contained herein, the Company may retain some or all of Your information in accordance with our policies and/or any applicable law(s).

Changes to Privacy Policy: We reserve the unconditional right to change, modify, add, or remove portions of this Privacy Policy at any time, without specifically notifying You of any changes. However, We may, at Our sole discretion, provide You push notifications or such other form(s) of notice as We deem necessary to keep You updated about this Privacy Policy. Any changes or updates will be effective immediately. You should review this Privacy Policy regularly for changes. You can determine if changes have been made by checking the “Last Updated” legend above. Your continued usage of the Website shall signify Your consent to such changes and You shall be legally bound by the same.

8. Grievance Officer:

If You have any grievance with respect to the Website, please feel free to reach out to the grievance officer, the name and contact details have been provided below:

Name: Mr. Nitin Mehta

Contact No.: +9122 69744435

Email: iro@growwmf.in

Registered Office:Vaishnavi Tech Park, South Tower, 3rd Floor, Survey No.16/1 and 17/2, Ambalipura Village, Varthur Hobli, Bellandur, Bangalore South, Bangalore- 560103, Karnataka

Corporate Office: 505 - 5th Floor, Tower 2B, One World Centre, Near Prabhadevi Railway Station, Lower Parel, Mumbai - 400013, Maharashtra

Branch Office- Office no. 601, Sixth Floor, Wing A, Integrated Arcade, Corner of Dharamshi Lane and R.B. Mehta Marg, Ghatkopar (East), Mumbai - 400077

9. Questions?

Please feel free to contact us at support@growwmf.in regarding any questions on the Privacy Policy.

10. Governing Law & Jurisdiction

This policy will be governed by and construed in accordance with the laws of India and subjected to the exclusive jurisdiction of Courts of Bangalore.