



Nirmata Research

Privacy Notice

June 2025

1 About this Privacy Notice

- 1.1 We are Nirmata Research ("**Nirmata**", "**We**", "**Our**", "**Us**") registered in the Cayman Islands with Company Number: HS-417734. Our registered office address is at Harneys Fiduciary (Cayman) Limited situated at 4th Floor, Harbour Place, 103 South Church Street, PO Box 10240, Grand Cayman KY1-1002. We are a research and development entity that operates and creates artificial intelligence technologies. Our website is www.nirmata.tech ("**website**").

We take your privacy very seriously. Please read this Privacy Notice carefully and ensure that you understand it. Your acceptance of it is required and will be confirmed if you continue to use our website or to provide personal data to us after you have been provided with a copy of it. If you do not agree to this Privacy Notice, you must immediately cease using Our website or providing personal information to us.

This Privacy Notice contains important information about what to expect when We collect personal data about you. It also sets out how We will use and share your personal data. We are the "**data controller**" of personal data processed in connection with this Privacy Notice. This means that We are responsible for deciding how We hold and use personal data about you.

- 1.2 This Privacy Notice applies to personal data that we collect about individuals and representatives of businesses that we do business with or who We provide services to.
- 1.3 Our contact details are set out in section 11.

2 The Personal Data we collect about you, how we collect it and what we use it for

- 2.1 We collect personal data about you when you provide information to Us or correspond with Us by post, phone, email, Our website or otherwise.
- 2.2 We also collect information automatically via Our online services using information-gathering technology and cookies. You can find out more information about this in Our Cookie Policy via Our website.
- 2.3 Occasionally We may receive information about you from other sources (such as publicly available information) which We will add to the information which We already hold about you in order to help Us provide services or consider your enquiry. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or criminal convictions and/or offences.
- 2.4 Personal data held by Us or on Our behalf depends on the context of your relationship or interaction with us but may include, but is not necessarily limited to, your name, residential address, place of business, email address, other contact details, corporate contact information, signature, nationality, country of residence, place of birth, date of birth, tax identification, tax jurisdiction, employment and job history, education details, regulatory status, credit history, correspondence records, call recordings, passport number, bank account details, certain financial information contained within KYC documents, source of funds and information about how you use our website, other technical data (such as your IP address, login data for our web portal, browser type and version, time zone setting and location).



2.5 The purposes for which We may collect, store and use your personal data are set out in the table below together with the 'lawful basis' for processing such data.

Purpose	Lawful basis for processing
To contact and to correspond with you.	Our legitimate interests in responding to your enquiry, contacting you in relation to the services you provide or otherwise communicating with you in the course of Our business.
To customise and adapt Our services to you, undertake business development and marketing activities in relation to making suggestions and recommendations to you about products or services that may be of interest to you or that you have opted-in-to receiving. This may include direct electronic marketing.	Our legitimate interests in promoting Our products and services and growing Our business. We only send direct electronic marketing where individuals have consented to this or as otherwise permitted by the law. Individuals can opt-out of receiving such messages at any time by using the opt-out mechanisms that may be available in those messages or by contacting admin@nirmata.tech .
To carry out anti-money laundering checks and related actions considered appropriate to meet any legal obligations relating to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with Our anti-money laundering procedures.	Compliance with applicable legal obligations and Our legitimate interests in complying with law and regulation applicable to us and our processors.
To report tax related information to tax authorities.	Compliance with applicable legal obligations and Our legitimate interests in complying with our legal and regulatory obligations.
To process and verify instructions, undertake quality and business analysis, comply with applicable laws and regulations, and maintain Our rights and responsibilities directly or through third party delegates. In doing so, we record and monitor calls and other communications.	Our legitimate interests in maintaining relations with Our clients and suppliers and in conducting Our business in a proper manner. Compliance with applicable legal obligations and Our legitimate interests in complying with Our legal and regulatory obligations.
To maintain Our records, carry out fee calculations, manage payments in relation to services made available and/or delivered to you.	The performance of your contract with Us as a client or supplier. Our legitimate interests in maintaining relations with Our contacts and in conducting Our business in a proper manner.
To provide Our services and client and/or supplier relations in respect of our contract with you including provision of periodic reporting, seeking consents for changes to terms and for other corporate governance purposes.	The performance of your contract with Us as a client or supplier. Compliance with applicable legal obligations and our legitimate interests in complying with Our legal and regulatory obligations.



To administer and maintain Our website and record, monitor and analyse your use of Our website.	Either your consent (for example, when We require your consent for the optional cookies that We use) or Our legitimate interests in studying how Our website is used, keeping Our website updated and relevant, to develop Our business and inform Our marketing strategy.
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2.6 Special categories of data

Personal data which reveals or contains racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation is designated as sensitive or special category data. We try to limit the circumstances where we process such categories of personal data and do not intend to request any such personal data from you. However, we may hold such personal data if you send it to us or it is provided within documents obtained for due diligence purposes, such as a copy of a passport. In such situations, we will use reasonable efforts to limit the period for which we hold such personal data.

2.7 Requirement to provide data

Unless and until you decide to engage in a transaction with Us you are not required to provide Us with any information. If you do wish to engage in a transaction with Us, in some circumstances, if you do not provide Us with certain information when requested, We may be limited or restricted in Our ability to deal with you and may in some cases be prevented from complying with Our legal obligations. Where We require your personal information to comply with anti-money laundering or other legal requirements, failure to provide this information means We may not be able to accept you or retain you as a client or supplier. We will let you know if any particular data is required when We request it. Please also note that Our website may automatically collect certain technical data (further details on this are above and in our Cookie Policy).

You may access certain areas of Our website without providing any personal data at all. However, to use all features and functions available on Our website you may be required to submit or allow for the collection of certain data. You may restrict Our use of Cookies. For more information, see Our Cookie Policy.

3 Who we share your personal data with

3.1 For the purposes set out above, We may share your personal data with a third party where this is required by law, is necessary to perform Our contract with you, if We sell, transfer, or merge parts of our business or assets, or We have another legitimate interest in doing so. Such third parties may include:

- 3.1.1 the administrator;
- 3.1.2 introducers, distributors or other intermediaries who market or provide services to you;
- 3.1.3 professional advisers and Our service providers to the extent such information is relevant to their performance of their services;
- 3.1.4 regulators;
- 3.1.5 tax authorities;



- 3.1.6 custodians/depositaries;
 - 3.1.7 trading counterparties;
 - 3.1.8 cloud service and technology providers; and
 - 3.1.9 parties undertaking anti-money laundering checks.
- 3.2 If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party and any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Notice.
- 3.3 If any of your personal data is shared with a third party, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.
- 4 Overseas transfers**
- 4.1 The personal data you provide may be transferred to other countries besides that in which you reside, where We or Our service providers operate and/or have facilities for the purposes outlined above or storage of personal data, including the Cayman Islands, the United States of America, the United Kingdom and the European Union. Where this is the case, save as otherwise required, or permitted, by applicable law or regulation, We will only store or transfer personal data in or to countries that are deemed to provide adequate levels of protection. We will (or We will require a processor to) put in place appropriate safeguards such as approved standard contractual clauses to cover and protect all such transfers before the transfer of your personal data to that country occurs.
- 5 Your rights**
- 5.1 Depending on applicable law, you may have rights which you can exercise in certain circumstances by contacting Us as set out below. These include the right:
- 5.1.1 to be informed and request access to personal data that We hold about you;
 - 5.1.2 to object to Our processing part of or all of your data;
 - 5.1.3 to request Us to stop processing your data for direct marketing purposes;
 - 5.1.4 to apply for rectification of your personal data;
 - 5.1.5 to apply for deletion of your personal data;
 - 5.1.6 to request the restriction of processing of your personal data;
 - 5.1.7 to request the transfer of your personal data to another party; and
 - 5.1.8 to withdraw any consent you may have provided at any time.
- 6 Marketing**
- 6.1 We may also want to provide you with related information from third parties that We think may be of interest to you. We will only do so where you agree or we are permitted to under applicable law. You may opt-out at any time by emailing us at admin@nirmata.tech.
- 7 Accuracy and retention of your personal data**



- 7.1 We want to ensure that your personal data is accurate and up to date. If any of the information that you have provided to Us changes, please let Us know.
- 7.2 We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected. This includes for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and Our legitimate interests in maintaining such personal information in our records.

In doing this We will have regard to:

- 7.2.1 the amount, nature, and sensitivity of the personal data;
- 7.2.2 the potential risk of harm from unauthorised use or disclosure of your personal data;
- 7.2.3 the purposes for which We process your personal data and whether we can achieve those purposes through other means; and
- 7.2.4 the applicable legal requirements.

Generally, We will keep information relevant to our dealings with you for any period during which We are dealing or expect to deal with you and 7 years following full redemption or the last date of activity save for or as required by applicable law or regulation.

8 Accessing Personal Data

- 8.1 If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it by submitting to us, a subject access request (“**SAR**”). All SARs should be made by using a SARs form (available on request) or in writing, using the contact details set out in section 11.
- 8.2 We will not charge for a SAR unless it is manifestly unfounded or excessive (for example, if you make repetitive requests) in which case we will charge to cover our administrative costs.
- 8.3 We will respond to your SAR as required by and within the timescales set out in, the Act. You will be kept fully informed of our progress.

9 Changes to Privacy Notice

- 9.1 We keep Our Privacy Notice under regular review and may update it at any time. If We change Our Privacy Notice We will post the changes on this page, and in case of substantial updates will place notices on other pages of Our website.

10 Complaints

- 10.1 If you have any queries, issues or complaints about how We act in relation to processing your personal data We would welcome the opportunity to address this. You can contact us using the details set out in section 11. However, you may also have the right to complain to a supervisory authority for data protection issues in the jurisdiction in which you reside, work, or where the alleged issue took place.

11 How to contact Nirmata

- 11.1 Should you wish to raise any matter related to this Privacy Notice or data protection in general, you can:
 - 11.1.1 send an email to admin@nirmata.tech; or



11.1.2 contact our Privacy Officers in the Cayman Islands, the Directors, Nirmata Research c/o Harneys Fiduciary (Cayman) Limited situated at 4th Floor, Harbour Place, 103 South Church Street, PO Box 10240, Grand Cayman KY1-1002.