

Privacy Policy

*This Privacy Policy describes how Casper Capital Partners LLP, as the Investment Manager of **Casper Empower Fund I** collects, uses, stores, and protects personal data submitted through caspercapital.in. This Policy is compliant with the Digital Personal Data Protection Act, 2023 (DPDPA) and applicable SEBI regulations.*

1. Data Controller

Entity: Casper Capital Partners LLP

On Behalf Of: Casper Empower Fund I

Address: 8-2-698, 5th Floor, MJ Tower, Road No. 12, Banjara Hills, Hyderabad – 500034

Email: compliance@caspercapital.com

2. What Personal Data We Collect

We currently collect personal data only through the contact enquiry form on this website. This may include:

- Full name
- Email address

We also collect certain non-personal, technical data automatically when you access this website, including your IP address, browser type, device type, pages visited, and time spent on the website. This data is collected through cookies and analytics tools (see Section 6).

3. Purpose of Data Collection

We collect and process your personal data for the following purposes:

- To respond to your enquiries submitted through the contact form.
- To communicate with you regarding the Fund, its investment strategy, or investor onboarding processes.
- To comply with applicable regulatory and legal obligations, including SEBI AIF Regulations and DPDPA, 2023.
- To improve the performance and user experience of this website through analytics.

We do not use your personal data for unsolicited marketing without your explicit consent.

4. Legal Basis for Processing

We process your personal data on the following legal bases:

- Consent: Where you have voluntarily submitted your information through the contact form.
 - Legitimate Interest: For website analytics and security.
 - Legal Obligation: Where required by SEBI, RBI, or other applicable regulators.
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5. Data Sharing & Disclosure

We do not sell, rent, or trade your personal data to any third party. Your data may be shared in the following limited circumstances:

- With our fund administrator, auditors, legal counsel, or compliance advisors, strictly for operational and regulatory purposes.
 - With SEBI, RBI, income tax authorities, or other government bodies where required by law or a valid legal process.
 - With Caphive (our investor portal platform), if you register as an investor, strictly for account management purposes.
 - In the event of a restructuring, merger, or acquisition involving the Investment Manager, personal data may be transferred to the successor entity subject to the same data protection obligations.
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6. Cookies

This website uses cookies – small text files stored on your device – to enable basic website functionality and to collect anonymised usage analytics. We use the following types of cookies:

- Essential Cookies: Required for the website to function correctly. These cannot be disabled.
- Analytics Cookies: Used to understand how visitors interact with the website (e.g., pages viewed, time spent). This data is aggregated and anonymised.

You may disable non-essential cookies through your browser settings. However, doing so may affect the functionality of certain parts of this website. By continuing to use this website without changing your cookie settings, you consent to our use of cookies as described.

Where required under applicable law, users may be provided with cookie consent preferences before non-essential cookies are activated.

7. Data Security

We take commercially reasonable technical and organisational measures to protect your personal data against unauthorised access, disclosure, alteration, or destruction. These include secure server infrastructure, encrypted communication (SSL/TLS), and access controls.

However, no data transmission over the internet or electronic storage system is entirely secure. We cannot guarantee absolute security and you transmit data to us at your own risk. In the event of a data breach affecting your rights, we will notify you as required under applicable law.

While reasonable security safeguards are implemented, transmission of information over the internet is inherently subject to cybersecurity and technological risks.

8. Data Retention

We retain your personal data only for as long as necessary to fulfil the purpose for which it was collected, or as required under applicable law. In line with SEBI AIF Regulations, records pertaining to investor communications and onboarding are retained for a minimum of 5 years from the date of collection or the end of the investor relationship, whichever is later. Contact form enquiries not resulting in an investor relationship will be retained for up to 12 months and then securely deleted.

9. Your Rights Under DPDPA, 2023

As a data principal under the Digital Personal Data Protection Act, 2023, you have the following rights with respect to your personal data held by us:

- Right to Access: You may request a summary of the personal data we hold about you and the purposes for which it is processed.
- Right to Correction: You may request correction of any inaccurate or incomplete personal data.
- Right to Erasure: You may request deletion of your personal data, subject to any overriding legal or regulatory obligations.
- Right to Withdraw Consent: You may withdraw your consent to data processing at any time, without affecting the lawfulness of processing prior to withdrawal.
- Right to Grievance Redressal: You may raise a grievance with our Grievance Officer (see Section 10) and expect a response within 30 days.

To exercise any of these rights, please write to us at compliance@caspercapital.com with your name, contact details, and the nature of your request. We may ask you to verify your identity before processing your request.

10. Grievance Officer

In accordance with the Digital Personal Data Protection Act, 2023, we have designated a Grievance Officer to address data protection concerns:

Name: Chandrashekar P

Designation: Compliance & Grievance Officer

Email: compliance@caspercapital.com

Address: 8-2-698, 5th Floor, MJ Tower, Road No. 12, Banjara Hills, Hyderabad – 500034

Complaints will be acknowledged within 7 business days and resolved within 30 days of receipt.

11. Third-Party Websites

This Privacy Policy applies solely to data collected on caspercapital.in. If you navigate to any third-party website through links on this website please refer to the privacy policy of that website. We are not responsible for the data practices of any third-party website.

12. Amendments

We reserve the right to update this Privacy Policy at any time to reflect changes in law, regulation, or our data practices. The updated policy will be posted on this page with a revised effective date. We encourage you to review this page periodically. Continued use of this website after any amendments constitutes acceptance of the revised policy.

13. Governing Law

This Privacy Policy is governed by the laws of India, including the Digital Personal Data Protection Act, 2023. Any disputes arising in connection with this policy shall be subject to the exclusive jurisdiction of the courts in Hyderabad, Telangana, India.

Last Updated: May 2026