Privacy Policy

Version 3 | Last updated: 11 November 2026

1. Who we are and what this policy covers

This policy is issued by Sachin Ramchandra Naik, trading as Intliri Academy, an individual SEBI registered Research Analyst (registration INH000021119, BSE enlistment 6570), 28, Jyotiba Colony, By Pass Road, Near Shanti Nagar, Amravati - 444 606. We decide why and how your personal data is used, so we are the "Data Fiduciary" under the Digital Personal Data Protection Act, 2023 (the DPDP Act).

It applies to the compliance portal and to the official website. It does not apply to the learning portal run on TagMango or to any other service, which have their own policies. Websites we link to are not covered.

2. The laws we follow

The DPDP Act, 2023 and the DPDP Rules, 2025; the Information Technology Act, 2000 and its rules on reasonable security practices; the SEBI (Research Analysts) Regulations, 2014, including Regulation 25 on keeping records; and SEBI's circulars and the Investor Charter for Research Analysts, which gives you a right to privacy and confidentiality.

3. What we collect, and when

- You visit the website: Technical details your browser sends: browser, device, pages viewed, date and time, and approximate location from your internet address
- You write or call us (for example to ask a question or make a complaint): Your name, email address, phone number and what you tell us, and a record of the call or chat where SEBI requires it
- You send a complaint through the form on the website: Your name, email address, phone number, the complaint category, your description and any files you attach. We use them to read and answer your complaint, and to keep the record the law requires.
- You register on the portal: Name, email address, phone number, and a record of your consent (date, time, device and internet address)
- You are onboarded as a client: PAN (stored encrypted), your KYC status and result from the KYC registry, your signed terms, a record that you have paid (amount, date and mode), and the name on your Aadhaar eSign
- You use the portal: A record of what you do and of the emails we send you

We do not keep your Aadhaar number, copies of your identity documents, or your card or bank details. Payments for our learning programmes are made on TagMango and handled under TagMango's own privacy policy; we never see your card or bank details. Our verification and signing partners hold what they need to do their job.

4. Why we use it

Only for: setting up and running your onboarding, verifying who you are, collecting your signature on the terms, recording your payment, completing your KYC, contacting you about these steps, answering your questions and complaints, running and securing our systems, and keeping the records SEBI requires of a Research Analyst.

We do not use your details for marketing, education or promotional messages through the portal. We do not sell or rent your data, and we make no decision about you by automated means alone. We never enter a client's personal data into any AI tool. The tools on our AI Hub do not need your personal data.

5. Your consent

We ask for your consent before we collect your details, with a short notice shown at that point. You can withdraw consent at any time by writing to us (section 12). Withdrawing is as easy as giving it. It stops any use of your details beyond keeping the records the regulations require.

6. Who handles your data for us

We do not sell or give your details to anyone to use for their own purposes. A few providers hold or handle data on our behalf, only to run the service, under contract, and they may not use it for anything else.

Providers that store your data for us. They keep it on our behalf. We do not hand it to them to read or use. Under their contracts they may use it only to provide the service, their staff may look at it only for support, security or legal reasons, under approved and logged access, and it is encrypted when stored and when sent.

- Vercel: Runs the official website and the portal (the portal in Singapore). The complaints form on the website sends what you type to our portal.
- Neon: The portal database (in Singapore). Sensitive values such as PAN are encrypted by us before they are stored, with a key the provider does not hold
- Amazon Web Services: The locked archive of signed documents and records (Mumbai, India), which cannot be altered or deleted during its retention period

Providers that receive some of your details to do a specific job for you.

- Digio: Your name and email, to verify you and collect your Aadhaar eSign on the Terms. Digio and the Aadhaar process hold what they need; we do not keep your Aadhaar number
- Zoho (ZeptoMail and Zoho Mail): Your email address and the emails we send you, so that they are delivered, and the replies you send to our support address (India)
- The KYC registry: The details needed to check or record your KYC

Authorities. We give information to SEBI, BSE, RAASB, courts or other authorities only where the law or an order requires it.

7. Where your data is stored

- The portal runs in Singapore, and its database is in Singapore.
- Signed documents and records are archived in Mumbai, India.
- Emails are sent and received through Zoho in India.
- The website pages are delivered through Vercel's network, which has servers in many countries, including outside India. What you send through the complaints form is processed on our portal, which runs in Singapore, and is not stored on the website's servers.

Where data goes outside India, our providers are bound by contract to protect it and use it only for our service. By using the website or the portal you accept this.

8. How long we keep it

SEBI Regulation 25 requires us to keep records for at least five years. We keep onboarding and compliance records for that period, and longer if a regulator, a dispute or a legal hold requires it. When the period ends and nothing requires us to keep them, we delete or anonymise them.

Messages you send us by email or other means: general enquiries are kept for one year after the last message and then deleted. If you become a client, they join your client record. Complaint records are kept for at least five years, as SEBI requires, as part of the complaints register. Messages from the form that turn out not to be complaints are deleted: spam after 30 days, enquiries after one year.

9. How we protect it

PAN and other sensitive values are encrypted. Only named members of our team can see client details, and each access is logged. Documents are kept in a locked archive that cannot be altered or deleted during its retention period. We keep encrypted backups and test our restore. No online system is perfectly secure, but we take reasonable steps to protect your data.

10. If something goes wrong

If a personal data breach affects you, we will tell you without delay: what happened, the likely consequences, what we have done, what you can do to protect yourself, and who to contact. We also report breaches to the Data Protection Board of India as the law requires.

11. Your rights

You can ask to:

- see the personal data we hold about you and how it is used;
- have it corrected, completed or updated;
- withdraw your consent;
- have it erased, subject to the next paragraph;

- nominate another person to exercise these rights for you if you die or cannot act.

Because SEBI requires us to keep onboarding and compliance records for five years, we cannot erase them during that period. If you ask, we tell you in writing that the record is kept and why.

12. How to use your rights, and how to complain

Write to our grievance contact: Sachin Ramchandra Naik, +91 84838 29386, support@intliriacademy.com. We may ask you to confirm your identity first. We will acknowledge your request within 48 working hours and answer within 30 days. If we cannot do what you ask, we will say why. Our reply will carry these contact details.

If you are not satisfied with this reply, please write to us first at support@intliriacademy.com. If we do not resolve it within 30 days, or you are not satisfied with the resolution provided by us, you may complain to the Data Protection Board of India. Complaints about our research services (not about your data) can also be made on SEBI SCORES (scores.sebi.gov.in) or through the grievance route on our website.

13. Cookies

The portal uses only the cookies needed to keep you signed in. The website does not set any cookies. We do not use analytics, advertising or session-recording tools on the website or the portal, and we do not run advertising on this website. If our practice changes, we will update this policy first. You can block cookies in your browser; the website still works.

14. Children

Our services are for people aged 18 and over. We do not knowingly collect children's data. If you think a child has given us data, write to us and we will delete it unless a law requires us to keep it.

15. Links to other sites

Our website links to SEBI, BSE and other sites. We are not responsible for their privacy practices.

16. Changes to this policy

We keep a version number and date at the top. If we make a material change, we will tell clients by email and on the portal. The version you agreed to is kept on record.

17. Contact

Intliri Academy, Sachin Ramchandra Naik, SEBI Registered Research Analyst, INH000021119. Address: 28, Jyotiba Colony, By Pass Road, Near Shanti Nagar, Amravati - 444 606. Email: support@intliriacademy.com. Phone: +91 84838 29386. Hours: Mon to Fri, 10 AM to 6 PM.

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