

ASHA SECURITIES LIMITED

PRIVACY NOTICE

A Member of the Colombo Stock Exchange.

Licensed by the Securities and Exchange Commission of Sri Lanka.

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1. Introduction

Asha Securities Limited (“ASL”, “we”, “us” or “our”) is a member of the Colombo Stock Exchange, licensed by the Securities and Exchange Commission of Sri Lanka. ASL pays particular attention to the collection, use, processing, disclosure, storage and protection of personal data obtained in the course of providing stock broking and related services.

This Privacy Notice explains how ASL collects, uses, processes, stores, discloses and protects personal data relating to clients, prospective clients, event participants, employees, contractors and other individuals with whom ASL interacts. Processing is carried out in accordance with the Personal Data Protection Act, No. 9 of 2022 of Sri Lanka, as amended, together with other applicable laws, regulations and regulatory requirements.

This Notice applies to personal data processed by ASL in connection with its activities, whether such data is collected electronically, online, by telephone, in writing, in person or through other lawful means.

1.1 When this Privacy Notice applies

- When you open, maintain or otherwise use a securities trading account or other account/facility with ASL.
- When you use ASL’s online trading facilities, electronic communications, alerts, e-statements or other digital services.
- When you provide documents or information to ASL for account opening, client due diligence, trading, settlement, customer service or other related purposes.
- When you communicate with ASL by email, telephone, in person, through digital channels or other communication methods.
- When you participate in events, webinars, seminars or other activities organised or facilitated by ASL.
- When you visit ASL’s premises or use ASL’s website or other online services.
- When you are an employee, contractor, service provider or other individual whose personal data is processed by ASL in connection with its business activities.

1.2 Websites, cookies and tracking technologies

Where ASL’s websites or online services use cookies or other tracking technologies, such technologies may collect information about your use of those services in order to operate, secure,

improve and, where applicable, tailor your browsing experience. Any separate cookie notice or relevant information made available by ASL should be read together with this Privacy Notice.

1.3 Changes to this Privacy Notice

ASL may amend this Privacy Notice from time to time to reflect changes in applicable law, regulatory requirements, business operations, technology or data-processing practices. The latest version will be made available through ASL's website or other appropriate client communication channels. Where a change materially affects the manner in which ASL collects, uses or shares personal data, ASL will take appropriate steps to notify affected individuals where required by applicable law.

1.4 Relationship with contractual and regulatory documents

This Privacy Notice should be read together with the agreements, terms and conditions, consent forms, account-opening documents, disclosures and other documents applicable to your relationship with ASL. Where a specific contractual or legal requirement governs a particular processing activity, that requirement will apply to the extent permitted by applicable data protection law.

2. What personal data do we collect?

"Personal Data" means information relating to an identified or identifiable individual. The personal data ASL processes depends on the services provided, the nature of the relationship with ASL and the requirements of applicable law and regulation.

Depending on the circumstances, ASL may process the following categories of personal data:

- Name, residential or business address, email address and telephone/mobile number.
- Date of birth, gender and other personal details required for identification and account administration.
- National Identity Card, passport, driving licence and other identification details or copies of identification documents.
- CDS account, client identification, trader identification and other account-related details.
- Financial information, bank account/payment details, financial holdings, transaction history, trading and settlement data.
- Employment, employer, occupation, business, company officer/director or shareholder information where required for client identification or regulatory purposes.
- Beneficiary, nominee, dependent or related-person information where required for account or transaction purposes.
- Information obtained for customer due diligence, identification verification, sanctions/PEP screening, background checks and other regulatory checks.
- Information relating to complaints, enquiries, customer feedback, surveys and communications with ASL.
- Photographic, video or CCTV information where you visit or interact with ASL premises or events.
- Information generated through use of online services, which may include IP address, browser/device information, pages visited, dates and duration of visits and similar technical information.
- Information provided for participation in ASL events, webinars, seminars and other activities.

2.1 Data relating to other individuals

Where you provide ASL with personal data relating to another individual, such as a beneficiary, nominee, dependent, authorised person or representative, you should ensure that you are entitled to provide such information and that the individual has been informed of the relevant processing where required by applicable law.

2.2 Data minimisation and sensitive personal data

ASL seeks to collect personal data that is relevant and necessary for the purposes for which it is processed. Where personal data constitutes sensitive or otherwise specially protected personal data under applicable law, ASL will process such data only where a lawful basis exists and with appropriate safeguards and consent where required.

2.3 Minors

ASL's services are not generally directed at children. Where personal data relating to a minor is collected or processed in connection with a lawful requirement, account arrangement or other permitted purpose, ASL will process such data in accordance with applicable law and appropriate safeguards.

3. How will we use personal data?

ASL processes personal data only where there is an applicable lawful basis. Depending on the circumstances, processing may be based on your consent, the necessity to enter into or perform a contract, compliance with a legal or regulatory obligation, legitimate interests, protection of vital interests, performance of a task carried out in the public interest or other lawful basis recognised by applicable law.

The purposes for which ASL may process personal data include, but are not limited to:

- Opening, establishing, administering and maintaining securities and related accounts.
- Providing stock broking services, including receiving and executing orders and providing access to trading facilities.
- Providing and managing online trading facilities, electronic statements, alerts and other client services.
- Facilitating securities transactions, settlement, custody-related processes and other activities connected with the client relationship.
- Communicating with clients and responding to service requests, enquiries, complaints and other correspondence.
- Verifying identity and conducting customer due diligence, enhanced due diligence and other client verification processes.
- Conducting sanctions, politically exposed person (PEP), adverse information, fraud and other risk-based screening and monitoring.
- Complying with applicable securities laws, regulations, directions, rules and requirements of the Securities and Exchange Commission of Sri Lanka, Colombo Stock Exchange, Central Depository Systems and other competent authorities.
- Making regulatory, statutory, supervisory and other legally required reports and disclosures, including where applicable to financial intelligence, law enforcement, courts and other competent authorities.

- Preventing, detecting, investigating and responding to fraud, money laundering, terrorist financing, proliferation financing, market abuse, cyber threats, misconduct and other unlawful or unauthorised activities.
- Monitoring and managing trading, credit, margin, operational, compliance and other risks arising from ASL's business.
- Maintaining records and complying with applicable record-retention, audit and accounting requirements.
- Administering billing, payments, fees, commissions and other financial matters connected with the services provided by ASL.
- Providing service updates, operational notices, regulatory announcements, educational communications and event invitations.
- Sending direct marketing communications where permitted and, where required, based on your prior consent.
- Conducting analytics, internal reviews, audits, risk assessments, service improvement and operational planning.
- Protecting ASL's premises, systems, information assets, employees, clients and other stakeholders.
- Defending legal rights, responding to legal claims, supporting investigations and cooperating with regulators, law enforcement and authorised third parties.
- Responding to requests made by data subjects and fulfilling rights and obligations under applicable data protection law.
- Managing corporate, contractual, administrative and other legitimate business activities of ASL.

3.1 Regulatory and market infrastructure processing

As a stock broker and member of the Colombo Stock Exchange, ASL is required to process and disclose certain client and transaction information to market infrastructure institutions and competent authorities in order to provide securities services and comply with applicable legal and regulatory requirements. This may include information required for securities account administration, trading, settlement, reporting, surveillance, risk management, compliance and other regulated activities.

3.2 Direct marketing

ASL may send information about products, services, educational programmes, events or other communications that may be of interest to you. Where prior consent is required for electronic direct marketing, ASL will obtain such consent before sending the relevant communications. You may opt out of direct marketing at any time through the method provided in the relevant communication or by contacting ASL.

4. Disclosure and sharing of personal data

ASL may disclose or share personal data where necessary for the purposes described in this Privacy Notice, where required to provide the services requested by you, where required or permitted by law, or where necessary to protect ASL's legitimate interests and the rights and safety of clients and other stakeholders.

Depending on the circumstances, recipients may include:

- The Colombo Stock Exchange and entities within or associated with the securities market infrastructure, including CDS, where relevant to the services provided.
- The Securities and Exchange Commission of Sri Lanka and other regulators, supervisory authorities and competent governmental bodies.
- Financial intelligence, law enforcement, judicial and other authorities where disclosure is required or permitted by law.
- Auditors, legal advisers, professional advisers and other persons appointed by ASL for legitimate business or regulatory purposes.
- Banks, payment service providers, technology providers, trading platform providers, communication providers, cloud or hosting providers and other service providers supporting ASL's operations.
- Third parties engaged for customer support, document processing, information security, screening, compliance, risk management or other legitimate operational functions.
- Other persons where you have provided consent or where disclosure is otherwise authorised by applicable law.

ASL will take appropriate steps to ensure that third parties processing personal data on its behalf are subject to appropriate confidentiality, security and data protection obligations. Access to personal data will be limited to those persons who have a legitimate need to access it.

5. International or Cross-border transfers

Where ASL transfers personal data outside Sri Lanka or permits access to personal data from another jurisdiction, ASL will assess and address the applicable data protection requirements and implement appropriate safeguards in accordance with the Personal Data Protection Act and other applicable law. Where required, ASL may obtain the necessary consent or use appropriate contractual or other safeguards for the transfer.

6. Retention of personal data

ASL retains personal data for as long as necessary to fulfil the purposes for which it was collected and processed, to maintain accurate records of the client relationship and transactions, and to comply with legal, regulatory, accounting, audit, dispute-resolution and other applicable requirements.

Where personal data is no longer required, ASL will take reasonable steps to securely delete, destroy or anonymise it, subject to any requirement to retain it for a longer period under applicable law or for the establishment, exercise or defence of legal claims.

7. Protection and security of personal data

ASL maintains appropriate technical and organisational measures designed to protect personal data against unauthorised access, disclosure, alteration, loss, destruction or other unlawful or accidental processing. These measures may include access controls, confidentiality obligations, system and network security, physical security, monitoring, backups, staff awareness and other safeguards appropriate to the nature of the personal data and the risks involved.

Although ASL takes reasonable measures to protect personal data, no method of electronic transmission, storage or communication can be guaranteed to be completely secure. You should exercise appropriate care when communicating sensitive information through electronic channels.

8. Personal data breaches

If ASL becomes aware of a personal data breach, ASL will assess and manage the incident in accordance with applicable law, regulatory requirements and its internal incident-response procedures. Where notification to the Data Protection Authority or affected individuals is required by law, ASL will make the relevant notification within the applicable statutory or regulatory timeframe.

9. Your rights

Subject to applicable law and any lawful limitations or exemptions, you may have rights in relation to your personal data, including:

- The right to request access to your personal data and information about how it is processed.
- The right to request correction or completion of inaccurate or incomplete personal data.
- The right to request deletion or erasure of personal data in circumstances permitted by law.
- The right to request restriction of processing in circumstances permitted by law.
- The right to object to certain processing, including processing based on legitimate interests, where applicable.
- The right to withdraw consent where processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.
- The right to object to or opt out of direct marketing.
- Rights relating to decisions based solely on automated processing or profiling, where applicable.
- The right to receive a copy of your personal data in circumstances provided for by applicable law.
- The right to make a complaint to the competent supervisory authority concerning the processing of your personal data.

The availability and scope of these rights may depend on the applicable law and the circumstances of the processing. ASL may require reasonable information or documents to verify your identity before responding to a request. ASL may also be entitled to decline or limit a request where permitted by law, including where the request is manifestly unfounded or excessive.

10. Automated decision-making and profiling

Where ASL uses automated processing or profiling in a manner that produces legal or similarly significant effects on an individual, ASL will comply with applicable legal requirements and provide the rights and information required by law. Where consent is required for a particular automated processing activity, ASL will obtain such consent.

11. Data protection officer / Contact details

If you have questions about this Privacy Notice, wish to exercise a data subject right, or have a complaint or concern regarding the processing of your personal data by ASL, you may contact ASL using the details below:

Data Protection Officer

Asha Securities Limited
No. 60, 5th Lane, Colombo 03
Email: dpo@ashasecurities.net
Telephone: 0112429109

12. Policy ownership and review

The ownership of this Privacy Notice rests with ASL. The Data Protection Officer is responsible for coordinating periodic reviews of the Notice and monitoring its implementation. This Notice will be reviewed at least annually and may also be reviewed following material changes to applicable law, regulatory requirements, business operations, technology or ASL's data-processing practices.

13. Further information and requests

Requests relating to your personal data or the exercise of your rights may be submitted to the Data Protection Officer using the contact details in Section 11. ASL may request information reasonably necessary to verify the identity of the person making the request and to process the request securely. Where permitted by law, ASL may charge a reasonable fee or refuse to act on a request that is manifestly unfounded or excessive.

14. Relationship with client consent forms

Where ASL obtains consent for the processing of personal data, such consent may be recorded through ASL's client onboarding documents, consent forms, online forms or other appropriate mechanisms. Such consent forms should be read together with this Privacy Notice. Withdrawal of consent may be requested through the contact details provided in this Notice, subject to any legal or contractual requirement that permits or requires ASL to continue processing the relevant personal data.