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PRIVACY & DATA

Privacy Policy

What personal data ShareRocketPro collects, why we use it, who we share it with, and the choices and rights you have.

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AT A GLANCE

- ShareRocketPro is an educational paper-trading simulator - we collect only what we need to run it well.
- We do not sell your personal data, and we do not use it for third-party ad targeting.
- You sign up with your name, phone number and a password - your phone number is your account identifier and an email address is optional.
- We verify phone numbers with one-time SMS codes sent through an SMS provider.
- You can access, correct, delete and export your data, and opt out of marketing at any time.
- Any optional top-ups or purchases are handled by payment providers - we never store full card numbers.
- Questions or a privacy grievance: info@sharerockets.com.

A product of Share Rocket Pro Pvt. Ltd.
Madargachh-7, Jhapa, Koshi Province, Nepal - Reg. 354406/81/82
Powered by Lacspace Corporation Pvt. Ltd. - Technology Partner

Legal & Compliance, Share Rocket Pro

Authorised signatory

This is a controlled legal document. The authoritative, current version is always the one published at sharerocketpro.com/legal/privacy-policy. Uncontrolled when printed.

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1. Introduction & Scope

This Privacy Policy explains how we handle personal data when you use ShareRocketPro. It must be read together with our Terms of Use.

1.1 ShareRocketPro is an educational paper-trading simulator. It uses real NEPSE market data for display, a simulated practice market and virtual practice money only, executes no real trades, and holds no client securities. This means the personal data we need is limited, and this policy reflects that.

1.2 The Service also includes PMS, an optional portfolio tracker in which you record real shares you own. It only stores what you enter or import; ShareRocketPro does not hold, trade or transfer securities, and PMS does not connect to your broker, MeroShare or CDSC accounts.

1.3 This policy covers the ShareRocketPro website, mobile apps and any related service (together, the "Service"). It applies to visitors, registered account holders, and anyone who contacts us.

1.4 "Personal data" means information that identifies you or that can reasonably be linked to you. Where this policy uses "we", "us" or "our", it means the data controller identified below.

1.5 If you do not agree with this policy, please do not use the Service.

2. Who We Are (Data Controller)

2.1 ShareRocketPro is operated by Share Rocket Pro Pvt. Ltd. ("Share Rocket Pro"), registered in Nepal (Reg. 354406/81/82, PAN 621237087), with its registered office at Madargachh-7, Jhapa, Koshi Province, Nepal. Share Rocket Pro is the controller responsible for your personal data. Its technology partner, Lacspace Corporation Pvt. Ltd., builds and hosts the platform and processes personal data only on Share Rocket Pro's instructions, as a processor.

2.2 For any privacy question, request or complaint, contact us at info@sharerockets.com. We aim to respond within a reasonable timeframe.

3. What Personal Data We Collect

We collect only what we need to provide and improve the Service. Depending on how you use it, this may include:

3.1 Account details - the information you give us when you register or manage your account:

a. your name or display name;
b. your mobile phone number, which is required and is your primary account identifier;
c. your email address, only if you choose to provide it;
d. a password (stored only in a hashed form, never as plain text);
e. whether and when your phone number was verified.

3.2 Profile information you choose to add, such as a photo, a short bio, or preferences and settings.

3.3 Virtual-portfolio and usage activity - your simulated trades, watchlists, practice-money balance and top-up history, rankings, progress, and how you interact with features and educational content.

3.4 Device and log data collected automatically, such as:

a. device type, operating system and app version;
b. IP address and approximate, network-derived region;
c. log events, timestamps and diagnostic or crash reports.

3.5 Cookies and local storage on the website, and equivalent local storage on the mobile apps, used to keep you signed in and remember preferences. See our Cookie Policy.

3.6 Support communications - the content of messages, emails and feedback you send us, so we can help you and keep a record.

3.7 Optional-purchase and top-up information. If you make an optional top-up or purchase, the transaction is processed by our payment providers. We receive limited confirmation details (such as a reference, amount and status) but we do not store full card numbers or complete payment credentials.

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3.8 Portfolio tracker (PMS) data, if you choose to use PMS - the real holdings and transactions you enter or import, and the price alerts you set. See "Portfolio Tracker (PMS) Holdings Data" below.

3.9 We do not intentionally collect special-category or sensitive personal data through the Service, and we ask that you do not submit it.

4. How We Collect It

4.1 Directly from you - when you register, set up a profile, make an optional deposit, contact support, or otherwise use features that ask for information.

4.2 Automatically - through the app and website as you use the Service, including device and log data and cookies or local storage.

4.3 From providers - limited information from our service providers, such as delivery status from our SMS provider, confirmation details from a payment provider, or aggregated diagnostics from analytics and crash-reporting tools.

5. Why We Use Your Data & Our Lawful Bases

We use personal data for the purposes below, each supported by a lawful basis such as performing our contract with you, our legitimate interests, your consent, or complying with law:

5.1 To provide the Service - create and maintain your account, run your virtual portfolio, save your progress and deliver features you request (basis: performance of our contract with you).

5.2 To verify your phone number by sending a one-time code by SMS, to recover your account, and to confirm that leaderboard rankings belong to real, unique users (basis: performance of our contract with you and our legitimate interests).

5.3 To keep the Service secure and prevent fraud, abuse and misuse of the simulation, practice money and other virtual balances (basis: our legitimate interests and, where relevant, legal obligation).

5.4 To improve the Service - understand how features are used, fix bugs, and develop new educational content (basis: our legitimate interests).

5.5 To communicate with you - send service and transactional messages, respond to support requests, and notify you of important changes (basis: performance of our contract and our legitimate interests).

5.6 To comply with law - meet legal, regulatory, accounting and record-keeping obligations, and respond to lawful requests (basis: legal obligation).

5.7 For marketing - send optional updates, tips and offers where you have opted in or where permitted, subject to your right to opt out at any time (basis: consent, or our legitimate interests where the law allows).

6. Push Notifications & Marketing Communications

6.1 We may send push notifications about your activity, alerts you set, and important Service updates. Notifications may be in Nepali and English and may include image cards personalised with your name and activity. You can control or disable push notifications in your device settings or in the app.

6.2 We send SMS messages to your phone number for verification codes and essential account messages. We do not use SMS for marketing unless you have agreed to it.

6.3 Marketing emails and messages are optional. Every marketing message includes a way to unsubscribe, and you can also opt out by emailing info@sharerockets.com.

6.4 Opting out of marketing does not stop essential service messages, such as security alerts, account notices or transaction confirmations, which are part of providing the Service.

7. Cookies & Similar Technologies

7.1 We use cookies and local storage on the website, and equivalent local storage in the apps, to keep you

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signed in, remember your preferences, and understand how the Service is used.

7.2 You can manage or clear cookies through your browser settings. Blocking some cookies may affect how parts of the Service work. Full details are in our Cookie Policy.

8. Analytics & Performance

8.1 We use privacy-respecting analytics and crash-reporting to measure performance, diagnose problems and improve the Service. Wherever possible this data is aggregated or does not directly identify you.

8.2 We do not use analytics for cross-site advertising or ad targeting, and we do not build advertising profiles about you.

9. How We Share Data

We do not sell your personal data. We share it only in the limited circumstances below:

9.1 Service providers and sub-processors - trusted vendors who help us run the Service, such as hosting, analytics, SMS, push-notification, email and payment providers. Our SMS provider receives your phone number and the message text only to deliver verification codes and account messages. They may process personal data only on our instructions, under contract, and to the extent needed to deliver their service.

9.2 Legal and safety - where we reasonably believe disclosure is required to comply with law, respond to a lawful request, enforce our Terms of Use, or protect the rights, safety and property of our users, the public or us.

9.3 Business transfer - if we are involved in a merger, acquisition, financing or sale of assets, personal data may be transferred as part of that transaction, subject to this policy continuing to protect it.

9.4 With your consent - where you ask us to share information, or otherwise agree to it.

10. We Do Not Sell Your Personal Data

10.1 We do not sell, rent or trade your personal data to third parties for money or other valuable consideration.

10.2 We do not share your personal data with third parties for their own independent marketing or advertising.

11. Payments, Top-ups & Practice Money

11.1 ShareRocketPro trades with virtual practice money only. Your simulated portfolio and practice money have no real-world monetary value; practice money is a non-withdrawable in-app educational balance that is not redeemable for real money.

11.2 If you make an optional top-up or purchase, payment is handled by our payment providers. They collect and process your payment details under their own privacy terms; we receive only limited confirmation details and never store full card numbers.

11.3 Deposits used for optional in-app services are verified manually. We keep the transaction records we need to run this process, prevent fraud, and meet our legal and accounting obligations. See our Refund Policy for related terms.

12. Portfolio Tracker (PMS) Holdings Data

PMS (Portfolio Management System) is an optional feature that lets you record the real NEPSE shares you own and see them valued at real NEPSE prices. Because holdings are financial information, we handle them with particular care.

12.1 What we store - only what you enter or import. For each transaction: the side (buy or sell), symbol, quantity (kitta), purchase date, transaction type (such as IPO, secondary, bonus, right, FPO, auction or mutual fund), purchase price, whether a DP charge is included, any price alert, your remarks and the broker you name - together with the values PMS calculates from them, such as WACC, profit and loss, and fee and tax estimates.

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12.2 MeroShare import. If you import a CSV file that you downloaded from MeroShare yourself, we process that file only to create the transactions you review and confirm. We never ask for, collect or store your MeroShare, CDSC, bank or broker login details, and PMS does not connect to MeroShare, CDSC, your depository participant or your broker.

12.3 Why we use it - solely to provide PMS to you: to value your holdings at market data prices; to calculate WACC, profit and loss, today's change, sector allocation and fee and tax estimates; to compare your portfolio with the market; to send the price alerts you set; and to let you export your data (basis: performance of our contract with you, at your request).

12.4 Who can see it. Your holdings are never shown on leaderboards, public profiles or to other users, never sold, and never used for advertising or shared with third parties for their own purposes. Authorised Share Rocket Pro Pvt. Ltd. staff can view your PMS holdings, transactions and alerts, together with your other account details, where needed to operate the Service, provide support, investigate abuse or errors, and meet legal obligations; staff access is limited by role-based permissions and every view of an individual portfolio is recorded in an audit log. At your request, authorised staff may also add or correct PMS records in your account; every such change is logged and you are notified of it. Service providers that host or process data for us (such as hosting and push-notification providers) handle it only on our instructions, as described in "How We Share Data".

12.5 Retention and deletion. PMS data is kept while your account is active, until you delete it. You can edit or delete any transaction at any time and export your history as a CSV file. When you delete your account, your PMS data is deleted together with your other account data within a reasonable period, apart from residual copies in secure backups that are overwritten on their normal cycle.

13. International Data Transfers

13.1 We are based in Nepal, and our service providers may process or store data in other countries. Where personal data is transferred across borders, we take reasonable steps to ensure it remains protected.

13.2 Those steps include working with reputable providers and using appropriate contractual and security safeguards consistent with this policy.

14. Data Retention

14.1 We keep personal data only for as long as we need it for the purposes in this policy - for example, while your account is active - and for a reasonable period afterwards.

14.2 We may retain certain data for longer where necessary to meet legal, accounting, security or dispute-resolution obligations, after which it is deleted or anonymised.

14.3 When you delete your account, we delete or anonymise your personal data within a reasonable period, except where we are required or permitted to retain specific records.

14.4 Portfolio tracker (PMS) holdings are kept until you delete them or your account, as described in "Portfolio Tracker (PMS) Holdings Data".

15. Data Security

15.1 We use technical and organisational measures to protect personal data, including encryption in transit, access controls, and restricting access to those who need it.

15.2 No method of transmission or storage is completely secure. While we work hard to protect your data, we cannot guarantee absolute security.

15.3 You also play a part - keep your password confidential, use a strong and unique password, and tell us promptly at info@sharerockets.com if you suspect any unauthorised access to your account.

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16. Your Rights

Subject to applicable law, you have rights over your personal data, including to:

16.1 Exercise the following rights:

a. access - get a copy of the personal data we hold about you;
b. correction - have inaccurate or incomplete data corrected;
c. deletion - ask us to delete your personal data;
d. objection - object to certain processing based on our legitimate interests;
e. restriction - ask us to restrict processing in certain circumstances;
f. portability - receive certain data in a portable, machine-readable format;
g. withdraw consent - withdraw consent at any time where we rely on it, without affecting prior processing.

16.2 To exercise any of these rights, email info@sharerockets.com. We may need to verify your identity before acting on a request.

16.3 We will respond within a reasonable time. There is normally no charge, though we may decline or charge for requests that are manifestly unfounded or excessive, as the law allows.

17. Children's Privacy

17.1 The Service is not directed to young children, and we do not knowingly collect personal data from them. You must meet the minimum age set out in our Terms of Use to use the Service.

17.2 If you believe a child has provided us with personal data, contact info@sharerockets.com and we will take reasonable steps to delete it.

18. Automated Decision-Making & Profiling

18.1 We do not make decisions that produce legal or similarly significant effects about you based solely on automated processing.

18.2 Where we use automated tools - for example, to rank simulated performance, personalise educational content, or detect abuse - these do not have legally significant consequences for you.

19. Your Choices & Account Controls

19.1 You can review and update much of your personal data directly in your account settings, including your profile details and preferences.

19.2 You can manage push notifications in your device or app settings, unsubscribe from marketing at any time, and control cookies through your browser.

19.3 You can delete your account at any time from within the Service or by contacting info@sharerockets.com; deletion is handled as described in Data Retention above.

20. Third-Party Links & Services

20.1 The Service may link to third-party websites, apps or resources, and may rely on third-party providers. We are not responsible for their privacy practices.

20.2 When you follow a link to a third-party service, or provide information to a payment provider, that party's own privacy policy governs how it handles your data. We encourage you to read it.

21. Changes to This Policy

21.1 We may update this Privacy Policy from time to time. The current version is always the one published at sharerocketpro.com/legal/privacy-policy, and the effective date at the top reflects the latest revision.

21.2 Where changes are material, we will notify you through the Service or by other reasonable means.

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Continued use after a change means you accept the updated policy.

22. How to Contact Us & Raise a Privacy Grievance

22.1 For any privacy question or to exercise your rights, contact us at info@sharerockets.com.

22.2 If you are unhappy with how we have handled your data or a request, you can raise a formal grievance through our Grievance & Dispute Resolution process. You may also have the right to complain to a relevant data-protection authority.

This document is issued by Share Rocket Pro Pvt. Ltd. and sets out its policies in plain language. It is not legal advice to you; for advice about your own situation, consult a qualified lawyer.

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