# AI DISCLOSURE POLICY

## FOR

## WEALTHDOOR INVESTMENT ADVISERS PRIVATE LIMITED

## A. MASTER AI DISCLOSURE FOR WEBSITE

This should appear under:

- Compliance Disclosures
- SEBI Disclosure Page
- Terms of Use
- Client Onboarding Page

### ARTIFICIAL INTELLIGENCE (AI) USE DISCLOSURE

**WEALTHDOOR INVESTMENT ADVISERS PRIVATE LIMITED (INA000022057) ("Investment Adviser") uses Artificial Intelligence ("AI"), Machine Learning ("ML"), automation technologies, algorithmic tools, analytical systems, large language models, data processing systems, RegTech solutions and related technologies in certain aspects of its operations and advisory services.**

The use of AI may extend to:

- Research and data analysis;
- Market information processing;
- Investment screening;
- Portfolio analytics;
- Financial planning assistance;
- Risk assessment support;
- Suitability assessment support;
- Report generation;
- Client communication assistance;
- Compliance monitoring;
- Record management;
- Operational efficiency functions;
- Internal workflow automation.

The Investment Adviser may use AI systems developed internally or obtained from third-party technology providers.

The use of AI is intended to assist the Investment Adviser and does not eliminate or reduce the fiduciary obligations owed to clients.

The Investment Adviser remains solely responsible for:

- Security of client data;

- Confidentiality of client information;
- Integrity of information used in advisory services;
- Accuracy and suitability of investment advice;
- Outputs generated by AI systems;
- Compliance with SEBI regulations;
- Compliance with the Investment Advisers Regulations;
- Compliance with applicable laws.

AI-generated outputs may contain inaccuracies, omissions, assumptions, biases or technical limitations. Accordingly, AI-generated information shall not be treated as a substitute for professional judgment.

Where applicable, all advisory recommendations generated with the assistance of AI shall be subject to review, validation and approval by authorized personnel of the Investment Adviser before being communicated to clients.

The Investment Adviser reserves the right to modify, enhance, discontinue or replace AI systems used in its operations from time to time.

This disclosure is made pursuant to Regulation 15(14), Regulation 18(9) and applicable provisions of the SEBI Investment Adviser regulatory framework.

## B. DISCLOSURE IN IA AGREEMENT (MANDATORY)

This is the most important disclosure because the Master Circular specifically requires disclosure of the extent of AI use to the client.

**USE OF ARTIFICIAL INTELLIGENCE**

The Client acknowledges that the Investment Adviser may use Artificial Intelligence tools and technologies in connection with:

- research;
- data analysis;
- portfolio analytics;
- risk profiling;
- suitability assessment support;
- report generation;
- client servicing;
- compliance monitoring;
- operational functions.

The Client understands and agrees that:

1. AI tools may assist the Investment Adviser but shall not replace the fiduciary obligations of the Investment Adviser.
2. The Investment Adviser remains solely responsible for investment advice provided to the Client.
3. The Investment Adviser remains solely responsible for the security, confidentiality and integrity of client data.
4. The Investment Adviser remains responsible for compliance with all applicable laws and regulations.
5. AI-generated outputs may contain limitations and therefore all advice shall remain subject to oversight and accountability of the Investment Adviser.

The Client acknowledges having been informed of the extent of use of AI in connection with advisory services.

## C. MOBILE APP / WEB PORTAL DISCLOSURE

Display during first login and within legal disclosures.

### AI NOTICE

This platform may use Artificial Intelligence technologies for analytical, operational, compliance and client service functions.

Any investment recommendation communicated through this platform remains the responsibility of the SEBI Registered Investment Adviser.

The Investment Adviser remains responsible for:

- client data protection;
- confidentiality;
- advice suitability;
- regulatory compliance.

## D. AI CHATBOT DISCLOSURE

If using ChatGPT, Claude, Gemini, Copilot, Perplexity or proprietary AI.

### IMPORTANT NOTICE

This interface uses Artificial Intelligence technology.

Responses generated by this system may be automated and may not always constitute regulated investment advice.

Investment advice shall be deemed provided only when reviewed, approved or issued by the Registered Investment Adviser in accordance with applicable SEBI regulations.

## E. RISK PROFILING DISCLOSURE

Insert in Risk Profiling Form.

### AI Assisted Assessment Disclosure

The risk profiling process may utilize automated analytical tools and AI-based systems to assist in processing responses and identifying risk characteristics.

Final suitability assessment and investment advice remain the responsibility of the Investment Adviser.

## F. SUITABILITY REPORT DISCLOSURE

Insert in every suitability report.

### AI Assisted Analysis Disclosure

Certain analytical components used in preparing this suitability assessment may involve Artificial Intelligence or automated analytical systems.

The final recommendation has been reviewed and approved by the Investment Adviser.

## G. PORTFOLIO RECOMMENDATION DISCLOSURE

Insert in all recommendation reports.

### AI Disclosure

This recommendation may incorporate outputs generated through Artificial Intelligence-assisted analytical systems.

The recommendation has been reviewed and approved by authorized personnel of the Investment Adviser, who remain fully responsible for its contents.

## H. PRIVACY POLICY DISCLOSURE

Dedicated section:

**USE OF AI TECHNOLOGIES**

The Investment Adviser may use AI technologies to improve operational efficiency, compliance monitoring, research, reporting and client servicing.

Where AI tools are utilized:

- access controls shall apply;
- cybersecurity controls shall apply;
- confidentiality safeguards shall apply;
- data minimization principles shall apply.

The Investment Adviser remains responsible for the protection of client information irrespective of whether AI tools are internally developed or externally procured.

## I. PRODUCTS / SERVICES OUTSIDE SEBI PURVIEW

This is often missed by RIAs and is mandatory where applicable under Regulation 18(8).

**DISCLOSURE**

In case advisory services are provided in relation to products or services that fall outside the regulatory purview of SEBI, such products, services and related advisory services shall be outside the regulatory jurisdiction of SEBI.

No recourse from SEBI shall be available in respect of grievances arising solely from such products or services.

## J. AI GOVERNANCE DISCLOSURE (BEST PRACTICE)

Add to website compliance section.

**Responsible AI Framework**

The Investment Adviser maintains a Responsible AI Framework which includes:

- AI inventory management;
- approved AI tool register;
- human oversight requirements;

- AI vendor due diligence;
- cybersecurity controls;
- AI incident management;
- periodic testing and validation;
- access controls;
- audit trail preservation;
- client disclosure controls.

## K. BOARD-APPROVED INTERNAL AI REGISTER

**Particulars**

AI Tool Name

Vendor

Purpose

Department

Client Data Access

Approval Date

Risk Classification

Human Oversight Owner

Review Date