

## Terms of Use

1. Trinkerr Learning Technologies Private Limited (hereinafter referred to as "the Company") is a social trading company based in Bangalore since 2021. The Company builds technology platforms for people to view and analyse what others are investing in.
2. At Trinkerr, a user can create a private or a public portfolio based on their research, analysis and understanding. A user can find the best performing public portfolios in selected categories and follow any of those public portfolios. Once done, they would be able to get notified whenever any transaction happens in the public portfolio.
3. A portfolio is a basket of stocks, ETFs, Gold, Commodity, Futures, and Options weighted intelligently based on its creator's particular objective or strategy.
4. Any user who has experience investing in the securities markets and is willing to share their trades/ portfolio with other users can create a public portfolio on Trinkerr and connect the Platform with their brokerage account.
5. Trinkerr will integrate with the available stockbrokers to enable trading transactions on the Platform. Trinkerr would act as an interface between the users and their respective stock brokers to power transactions in a secured and compliant manner. Users are expected to put all their orders through the Platform, which will get transmitted to their stockbrokers. Hence, the Platform will have a complete view of the users' trades and their performance.
6. Public portfolio creators are expected to execute all their trades through the Platform; the Platform does not guarantee that the users following their general portfolio will not execute trades through other channels.
7. The Platform facilitates the users to find public portfolios suitable to the users' investment objectives through a list of pre-set algorithms and parameters; such parameters are identified based on criteria determined by the users themselves. While the Platform provides a list of public portfolios, the users are free to select and follow any such portfolio without any intervention by the Platform. The Platform does not identify an appropriate portfolio for a user to follow based on the risk appetite, investment objectives or other attributes. While the Platform allows the users to view the trades executed in a public portfolio and alerts the users when a new trade is executed in the portfolio, the users have complete discretion while deciding to adopt the trading strategy employed by the portfolio creator. The alert given by the Platform, in this case, is a mere technical functionality provided by the Platform for the benefit of the users, and it is not investment advice generated for such users.
8. The Platform allowing users to view the trades executed in public portfolios shall not be considered investment advice. The users should consult their financial advisors before carrying out any trades/ investments. The decision to share the trades carried out by public portfolio creators with the other users on the Platform is taken independently out of their free will and volition. The Platform offers no incentives to the public portfolio creators to either execute their trades through the Platform or share such trades with the other users.

9. It may be noted that any incentives offered by the Platform to public portfolio creators are solely based on the number of people following such users and are not based on the volume of trades executed by the followers of such users. The incentives shall not be construed as an inducement/ encouragement to execute their trades through the Platform or to share the trades executed by them with the other users on the Platform. It may further be noted that, as these incentives are not linked to the trades carried out by the followers of a public portfolio creator, such incentives shall not be deemed as investment advisory fees, and the users hosting such public portfolios shall not be considered as IAs.
10. Users hosting a public portfolio on the Platform would be required to execute all their trades through the Platform, and the Platform would be sharing the trades executed by them with all their followers. The Platform would be analysing these trades on predetermined criteria/ parameters to analyse the performance of any public portfolio and its creator. The followers of a public portfolio would have the option to adopt the trading strategy employed by its creator. As per Regulation 2(1)(l) of the IA Regulations, investment advice means advice relating to an investment in securities or investment. While a public portfolio creator will be permitting other users to view their trades and portfolio, these users will not be providing any advice on securities or investments. Any user on the Platform can merely view the trades executed in the public portfolio, and the same cannot be considered investment advice. People following a general portfolio have the discretion to carry out their research and analysis while employing a similar trading strategy. They are responsible for determining whether a particular trading strategy used in a public portfolio is suitable. Thus, merely permitting other users to view one's trades and adopt similar trading strategies at their discretion cannot be considered as investment advice.
11. A user will receive alerts regarding the trades carried out in a public portfolio they follow. It should be noted that no fee is charged from any user for receiving any alerts on the trades carried out in a public portfolio they follow. Such alerts are issued by the Platform completely free of cost. Furthermore, it is understood that no impression is given to followers that such sharing of trades, or alerts regarding the trades carried out in a public portfolio they follow, shall be construed as investment advice. Allowing the users to view the trades executed in a public portfolio should not be considered investment advice. The users should consult their financial advisors before carrying out any trades/ investments.
12. The content and data available on the Trinkerr website and app, including but not limited to portfolio index value, portfolio return numbers and absolute portfolio returns, are for information and illustration purposes only.
13. Charts and performance numbers might include backtested/simulated results calculated via a standard methodology and do not include the impact of transaction fees and other related costs. Data used to calculate historical returns and additional information is provided by exchange approved

third-party data vendors and has neither been audited nor validated by the Company.

14. Trinkerr is not licensed to any exchange, trading or settling venue outside India.
15. Trinkerr.com sources real-time market data from an exchanged approved vendor. Prices shown on the [trinkerr.com](https://trinkerr.com) and Trinkerr app may be delayed, and Trinkerr Learning Technology is not responsible for the accuracy and correctness of the prices. Before order placement, you will see the Level 1 market depth of the instrument on the Trinkerr website or app.
16. All the comparison matrices and information present on Trinkerr.com help investors in their learning and decision-making process. It shall not be considered as a recommendation or investment advice. Past performance does not guarantee future returns, and the performance of portfolios are subject to market risk.
17. The index value of any portfolio is taken as a base value of 100 on the portfolio's inception date. It is not linked to an index developed by the NSE Indices. The change in index value from 100 is then compared with the NIFTY 50 index value.