

ASNANI STOCK BROKER PRIVATE LIMITED

DATA RETENTION AND DESTRUCTION POLICY

1. Policy Information

- **Organization Name:** ASNANI STOCK BROKER PRIVATE LIMITED
- **Nature of Entity:** SEBI-registered Depository Participant (CDSL)
- **DP ID:** 82000
- **Policy Title:** Data Retention and Destruction Policy
- **Approved By:** Managing Director / Authorized Director

2. Introduction

2.1 Purpose of the Policy

The purpose of this Data Retention and Destruction Policy ("Policy") is to ensure that all records, documents, and data of ASNANI STOCK BROKER PRIVATE LIMITED ("the Company") are:

- Maintained in accordance with **SEBI Regulations, CDSL Operating Instructions**, and other applicable laws;
- Adequately protected from unauthorized access, loss, misuse, or alteration;
- Retained for the prescribed period based on regulatory, legal, and business requirements; and
- Securely destroyed once they are no longer required.

This Policy also aims to assist employees in understanding their obligations relating to the retention, storage, and disposal of **physical and electronic records**, including emails, system data, scanned documents, PDFs, images, and other digital files.

2.2 Policy Statement

The Company is committed to maintaining records in a systematic, secure, and compliant manner. Records shall be retained only for as long as necessary to meet statutory, regulatory, contractual, and operational requirements and shall be destroyed in a controlled and secure manner thereafter.

3. Scope

This Policy applies to:

- All employees, officers, directors, and authorized personnel of the Company;
- All records maintained in **physical or electronic form**;
- All departments, branches, and locations of the Company;
- All records relating to clients, depository operations, compliance, finance, HR, and administration.

4. Definitions

- **Record:** Any document, data, register, file, correspondence, report, agreement, or information created or received during the course of business.
- **Electronic Record:** Any record created, stored, or maintained in digital form including emails, system logs, databases, scanned documents, and backups.
- **Retention Period:** The minimum period for which a record must be preserved.
- **Destruction:** Secure disposal of records after completion of the retention period.

5. Policy Framework

5.1 Record Retention

The Company shall retain records in accordance with:

- SEBI Act, Rules, and Regulations
- CDSL Operating Instructions
- Income Tax Act, Companies Act, and other applicable laws
- Internal compliance and audit requirements

Where multiple regulations prescribe different retention periods, **the longer period shall prevail.**

5.2 Record Administration

- The **Compliance Officer** shall be responsible for administration and monitoring of this Policy.
- The Compliance Officer, in consultation with management, may update retention schedules to ensure ongoing regulatory compliance.
- Periodic reviews shall be conducted to assess adherence to this Policy.

6. Responsibilities of Staff

All employees are responsible for:

- Maintaining records accurately and honestly;
- Ensuring information provided to the Company is correct and updated;
- Informing the Compliance Officer of any discrepancies or changes;
- Protecting confidentiality of records and data;
- Complying fully with this Policy at all times.

The Company shall not be responsible for inaccuracies unless employees have informed management of required corrections.

7. Data Security

7.1 General Security Requirements

All staff shall ensure that:

- Personal and confidential data is securely stored and accessed only by authorized persons;
- No information is disclosed to unauthorized third parties, whether intentionally or accidentally;
- Records are protected against theft, loss, damage, or misuse.

7.2 Physical Security

- Physical records shall be stored in locked cabinets or secure record rooms.
- Access shall be restricted to authorized personnel only.

7.3 Electronic Security

- Electronic records shall be protected by passwords, role-based access controls, and system security measures.
- Regular data backups shall be maintained.
- Portable media and devices shall be password-protected and encrypted where applicable.

7.4 Off-Site Data Handling

- Personal or confidential data shall not ordinarily be stored or processed at employees' homes or personal devices.
- Any exception shall require prior approval of the Compliance Officer and adherence to all security safeguards.

- Data stored on portable devices shall remain the responsibility of the authorized user.

Unauthorized disclosure or misuse of data shall be treated as a disciplinary matter and may constitute serious misconduct.

8. Data Retention Schedule (Indicative)

Record Type	Retention Period
Articles of Incorporation & Amendments	Permanent
Policies & Manuals	Permanent
Board / Management Meeting Minutes	Permanent
SEBI Registration Certificates	Permanent
Correspondence with SEBI / CDSL / Exchanges	Permanent
Client Account Opening & KYC Records	5 years after account closure
Client Correspondence	10 years after account closure
Depository Transaction Records	5 years
Compliance Reports & Filings	5 years
Inspection Reports & Replies	Permanent
Financial Statements	Permanent
Books of Accounts & Vouchers	8 years

9. Legal Hold / Suspension of Destruction

Where records are subject to:

- Regulatory inspection
- Litigation
- Investigation or inquiry

Destruction of such records shall be **immediately suspended**, irrespective of retention expiry, until clearance is received from management or legal counsel.

10. Data Destruction

- Records shall be destroyed only after expiry of the retention period.

- Physical records shall be destroyed by shredding or other secure methods.
- Electronic records shall be permanently deleted and rendered non-recoverable.
- Destruction shall be carried out in a controlled and authorized manner.

11. Monitoring and Compliance

- Compliance with this Policy shall be monitored by the Compliance Officer.
- Any deviation or breach shall be reported to senior management.
- Corrective and preventive actions shall be taken as required.

12. Review and Amendment

This Policy shall be reviewed periodically and updated to reflect changes in:

- SEBI Regulations
- CDSL Operating Instructions
- Applicable laws or internal processes