



Data Retention and Disposal Policy

1. Policy Information

Organization: Vramath Financial Services Private Limited

Policy Operational Date: 19th January, 2022

Policy Approved by: Mr. PL M Palaniappan

2. Introduction

a. Purpose of the policy:

- The purpose of this Policy is to ensure that necessary records and documents of are adequately protected and maintained and to ensure that records that are no longer needed by Vramath Financial Services Private Limited or are of no value are discarded at the proper time. This Policy is also for the purpose of aiding employees of Vramath Financial Services Private Limited in understanding their obligations in retaining electronic documents -including email, text files, digital images, sound and movie files, PDF documents, and all Microsoft Office or other formatted files or paper documents.

b. Policy Statement:

- This Policy represents Vramath Financial Services Private Limited regarding the retention and disposal of records and the retention and disposal of electronic documents.

3. Scope

This policy applies to employees, staff, and other personnel who are responsible for owning and managing records and documents in either paper or electronic formats.

4. Policy

This policy defines the Data retention and disposal schedule for paper and electronic records. The Data Retention Schedule is approved as the initial maintenance, retention and disposal schedule for the physical (paper) and electronic records of Vramath Financial Services Private Limited. The IT committee of Cyber is responsible for the administration of this policy and the implementation of processes and procedures. In conjunction with General Counsel, the Administrator is also authorized to; make modifications to the Record Retention Schedule as needed to ensure that it is in compliance with state and federal laws; ensure the appropriate categorization of documents and records on behalf of the company annually review the policy; and monitor compliance with this policy.

5. Responsibilities of Staff

All staff is responsible for:

- checking that any information that they provide to the Administration in regards to their employment is accurate and up to date.
- informing the Administration of any changes to information, which they have provided i.e. changes of address
- Checking the information that the Organization will send out from time to time, giving details of information kept and processed about staff.
- Informing Vramath Financial Services Private Limited (Compliance Officer) of any errors or changes. The Academy cannot be held responsible for any errors unless the staff member has informed the management of them.

6. Data Security

a. All staff are responsible for ensuring that: Any personal data which they hold is kept securely. Personal information is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

b. Staff should note that unauthorised disclosure and/or failure to adhere to the requirements set out above will usually be a disciplinary matter, and may be considered gross misconduct in some Data cases.

c. Personal information should be; kept in a locked filing cabinet; or in a locked drawer; or if it is computerized, be password protected; or when kept or in transit on portable media the files themselves must be password protected.

d. Personal data should never be stored at staff members' homes, whether in manual or electronic form, on laptop computers or other personal portable devices or at other remote sites,

e. Ordinarily, personal data should not be processed at staff members' homes, whether in manual or electronic form, on laptop computers or other personal portable devices or at other remote sites. In cases where such off-site processing is felt to be necessary or appropriate, the agreement of the relevant Data Controller must be obtained, and all the security guidelines given in this document must still be followed.

f. Data stored on portable electronic devices or removable media is the responsibility of the individual member of staff who operates the equipment.

Data Retention Guidelines

Records

a. Articles of Incorporation and amendments	Permanently
b. Policies	Permanently
c. Meeting Minutes	Permanently
d. SEBI Registration Certificate	Permanently
e. Correspondence relating to Exchange	Permanently
f. Correspondence relating to Clients	Till Trading Account Active and after closure 10 years
g. Compliances Report	Permanently