

Data Retention and Preservation Policy

1. Objective

The objective of this policy is to define the framework for systematic retention, preservation, and retrieval of data/records in compliance with SEBI Regulations, Exchange directives, PMLA requirements, and other applicable laws. The policy ensures that all critical client and business records are securely stored for the prescribed period and are retrievable for regulatory/audit purposes.

2. Scope

This policy covers the retention and preservation of all records (physical and electronic), including but not limited to:

- KYC documents and account opening forms.
- Client agreements and authorizations.
- Trading-related data (order logs, trade confirmations, contract notes).
- Ledger balances, financial statements, and client transaction records.
- Demat account-related records.
- Email/communication with clients.
- Audit reports, compliance reports, and internal control documents.
- Any other regulatory submissions/records.

3. Retention Period

Record Type	Retention Period	Regulatory Reference
KYC Documents (account opening forms, ID proofs, PAN, etc.)	Minimum 8 years from date of closure of account	SEBI/PMLA
Client Ledger, Books of Accounts, Statements	8 years	Companies Act/SEBI
Order/Trade Logs & Contract Notes	5 years	SEBI/Exchange
Demat Account Records	8 years	SEBI/Depositories
Compliance, Internal Audit & Inspection Reports	5 years	SEBI/Exchange
Correspondence with Clients/Regulators	5 years	Good Practice/SEBI

Corporate Member : N S E / B S E / M S E I / MCX
(Capital Market / F&O / Currency and Commodity Segment / Commodity Exchange)

Regd. / Correspondence / Corporate Office :

Amrapali House, Opp. Monte Cresto,
Nr. Taj Hotel, Sindhu Bhavan Road,
Bopal, Ahmedabad-380058.
Gujarat, India.

Email : acfsi@amrapali.com
Web. : www.amrapali.com
CIN : L65910GJ1994PLC118992
T : +91 2717429100/01/02

4. Mode of Retention

- **Electronic Records:** Stored in secured servers with restricted access, regular backups, and encryption.
- **Physical Records:** Preserved in secured storage areas with controlled access.
- **Cloud/Third-Party Systems:** Allowed only if SEBI/Exchange-approved vendors are used and proper confidentiality safeguards are in place.

5. Access and Security

- Access to preserved data is strictly limited to authorized personnel.
- Proper audit trails shall be maintained for creation, modification, and retrieval of records.
- Regular backups are taken and tested to ensure data recovery in case of system failure.

6. Destruction of Records

- After the expiry of the prescribed retention period, records may be destroyed with approval from the Compliance Officer/Management.
- Destruction shall be done in a secure manner (shredding for physical records, permanent deletion for electronic data).

7. Regulatory Reporting & Audit

- All preserved records must be readily available for inspection by SEBI, Exchanges, Depositories, or any statutory authority.
- The Compliance Officer shall ensure adherence to prescribed retention timelines.

8. Review of Policy

- The policy shall be reviewed annually or earlier, in line with regulatory changes.

Responsibility:

- **Primary Custodian:** Operations/Back Office Team.
- **Supervisory Authority:** Compliance Officer.
- **Escalation:** Board of Directors

Place: Ahmedabad

Updated Date: 31-03-2025

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FOR AMRAPALI CAPITAL AND FINANCE SERVICES LIMITED



Designation of the Issuing Authority:

(Compliance Officer / ~~Director~~ / ~~Proprietor~~ / ~~Partner~~ / ~~HR Manager~~)

Name: Nilesh Kapuriya

Corporate Member : N S E / B S E / M S E I / MCX
(Capital Market / F&O / Currency and Commodity Segment / Commodity Exchange)

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