

# **Document Retention and Archival Policy**

**National Securities Depository Limited**

**Document Information**

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1	May 26, 2022	1.0	Malav Shah, Vice President - Head of Legal & Compliance Officer	Approved
2	May 23, 2023	1.1	Malav Shah, Vice President - Head of Legal & Compliance Officer	revision pursuant to annual review
3	July 16, 2024	1.2	Malav Shah, Vice President - Head of Legal & Compliance Officer	Reviewed and no change required
4	May 17, 2025	1.3	Yash Gyanani- Head of Legal & Compliance Officer and Chief Regulatory Officer	1. Amendment to Clause 1,11 and 12. 2. Amendment to Serial Number 16 of Annexure 1 (Change from Code of Ethics to Code of Conduct).
5	April 30, 2026	1.4	Suresh Nair, Senior Vice President - Head of Legal & Compliance Officer	Amendments to clause 2,6,7,8,9,10 and Annexure I.

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## 1. Introduction

Every organization in the course of its work generates documents and records in physical or electronic form. For historical and legal purposes, the records are required to be maintained either permanently or for a limited period of time and in this regard, NSDL, as a depository, has been guided by various regulatory legal, operational and business requirements. Considering the importance of records and information handled at NSDL, there is a need to design a policy at the organisation level to ensure efficient management of records/ data/ information, whether electronic or physical. A document retention and archival policy involves the systematic identification, categorization, maintenance, review, retention, retrieval, and disposal of documents received or created in the course of business.

This policy is formulated to ensure compliance of Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations (SEBI LODR Regulations) and other applicable laws.

## 2. Purpose and Objective

This policy ("Policy") is framed in accordance with the provisions of Regulation 9 of the SEBI LODR Regulations read with Regulation 30(8) of SEBI LODR Regulations with the objective of classifying, maintaining and preserving the documents in at least two categories as follows-

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions:

This Policy aims to :

- (a) organize documents and records that will enable search and retrieval;
- (b) define the period of retention of various kinds of documents;
- (c) dispose-of documents and records that are no longer needed;
- (d) meet the regulatory and legal requirements.

It defines the organisation's responsibility on preservation of documents and to provide guidance to the employees in making decisions on Document Management. This Policy will outline systematic identification, categorisation, maintenance, retention, retrieval, archival and Disposal of documents received or created in the depository operations

### 3. Definitions

- 3.1. "Applicable law" means any law, statutory rules & regulations or standards applicable to the Company, under which any guideline/ provision with regard to the preservation of the documents has been prescribed.
- 3.2. "Archival" means the process of moving documents which are no longer used actively to a separate storage location after the end of Retention period for long term Retention.
- 3.3. "Archival Schedule" means the time frame for which the documents are to be archived. Archival Schedule will commence after the end of the Retention Schedule.
- 3.4. "Company" or "NSDL" means National Securities Depository Limited.
- 3.5. "Disposal" means physical or technical disposal of any Document, sufficient to render the information contained in the document irretrievable by ordinary commercially available means.
- 3.6. "Document(s)" refers to notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes of meetings, agenda notes, registers, ongoing and past contracts, litigation, proceedings, complaint, dispute, records, and or any other document (including those required under or in compliance with the requirements of any "Applicable Law") maintained on paper or in electronic form and does not include multiple or identical copies.
- 3.7. "Document Categories" means types of documents by which the nature of the document can be identified. Refer 'Document Categories' stated under Annexure I is enclosed for description of each document category.
- 3.8. "Electronic Form" means maintenance of Documents in any contemporaneous electronic device such as computer, laptop, hard drives, space on electronic cloud or any other form of storage and retrieval device considered feasible.
- 3.9. "Head of Department (HoD)" means individuals or group of individuals, heading or jointly heading, any function, business vertical or department in the Company including, individuals appointed as acting heads.
- 3.10. "Maintenance" means upkeep of documents, either in original, physical, electronic or archived form.
- 3.11. "Original Form" means Documents to be retained in the original form in which they were created or used i.e. either electronic or physical.
- 3.12. "Physical Form" means Documents to be retained in hard copy or paper form. These records may be kept in file cabinets or any other storage units assigned to each department with proper labelling so as to enable quick identification of the records.
- 3.13. "Point of Contact (POC)" means the person directly reporting to the HoD and shall remain responsible for implementation of this Policy in the respective Department. The HoD may choose to nominate more than one POC with segregated responsibility.
- 3.14. "Preservation" means to keep in good order and to prevent from being misplaced,

damaged or destroyed.

- 3.15. "Retention" means preserving the documents in the live environment for active use of the Company, which are readily accessible by those who are authorised to access.
- 3.16. "Retention Schedule" means the time frame for which the Documents are to be retained in live environment, post which the said Document shall be due for Archival.

#### **4. Applicability**

The Policy will be applicable to all employees, contractors and partners of NSDL and cover all the departments operating under NSDL. All employees are responsible to maintain and preserve the Documents that are generated in the activities undertaken, as per guidelines and processes laid down in this Policy.

This Policy will help in meeting the statutory requirements of maintaining the Documents by NSDL for minimum period prescribed under Applicable Laws.

#### **5. Roles, Responsibility and Enforcement.**

##### **5.1 Roles**

All employees play an integral part in maintaining and preserving the Documents that are generated including Original, Physical, Electronic or scanned form, as per guidelines and processes laid down in this Policy. The employees shall familiarize themselves with the contents of this Policy and follow the process laid down for Preservation, Retention, Archival and Disposal of the Documents.

##### **5.2 Responsibility**

Every department is responsible for and owns the Document it creates, receives, uses, stores, processes or destroys. The Departments shall create and maintain a comprehensive 'List of Documents' as per Annexure I that they currently hold, corresponding to the Document Categories defined in this Policy with corresponding timeline for preserving, retaining, archiving and disposing of such

Documents. The HOD and respective POC shall ensure that Documents of their departments are categorised as per Document categories defined in the Policy and necessary steps are taken to apply Document management schedules.

### **5.3 Enforcement**

The responsibility of enforcing the requirements of this Policy is with respective HoDs which can be further delegated to the POC. The 'List of Documents' (Annexure- I) shall be adopted by respective HoD in consultation with the Compliance Officer. The HoDs shall confirm compliance of this Policy to the Compliance Officer at yearly intervals. The Compliance Officer shall also provide necessary guidance to all other departments/ functions to enable seamless implementation and adoption of the most appropriate data management schedule as established under this Policy.

In case there are existing documented operating procedures on Document management, then the HoDs shall change such procedure to be in line with this Policy and circulate within the Department for the benefit and clarity for its employees.

### **5.4 General guiding principles in Preservation**

All the employees shall at all time abide by following guidelines on Document management:

- 5.4.1 All original agreements with vendors, contractors, inter-company agreements or any strategic agreements entered by the Company will have to be preserved in safe cabinets in the premises of the Company under the custody of respective HoDs or employees.
- 5.4.2 Each HoD shall decide on converting the Documents from Physical Form to Electronic Form and also maintain the Documents in Physical Form to meet the requirements under Applicable Law. For instance: Legal Contract may be converted from Physical Form to Electronic Form and the original contract in Physical Form can be archived in accordance with the Policy.
- 5.4.3 Each HoD shall encourage creation of Documents in Electronic Form by using digital signatures or other means and reduce creation of Documents in Physical Form. It will be also preferred to receive Documents in Electronic Form from external sources for its operations after considering the Applicable Laws.
- 5.4.4 The existing Documents should be digitised by all the Departments. A document management solutions (DMS) may be implemented wherein the employee scans the Document for uploading to DMS at pre-determined

frequency as defined under the Annexure I. DMS shall establish linkage with other application for quick retrieval of records.

5.4.5 Any changes in the regulations, applicable laws or any guidelines issued by the Regulator with respect to preservation of Documents will prevail over this Policy.

5.4.6 Each employee shall be responsible for returning the Document in their possession or control to the Company upon resignation, termination or retirement.

## **6 Categories of Documents**

This Policy prescribes the following categories for classification of all Documents:

### **A. Permanent Documents**

Permanent Documents are Documents that must be retained forever either by virtue of the nature of the Documents or as per requirement under Applicable Laws. Such Permanent Documents should be identified by the HoDs and categorized in the List of Documents in the manner set out in Annexure I.

### **B. Documents to be preserved for a period of 8 years.**

The documents required to be retained for a minimum period of 8 years after completion of the transaction, is as per the Annexure I to the policy.

### **C. Non Essential Documents -**

Documents that are neither Permanent Documents nor required to be preserved for a specific period under the Applicable Law shall fall under the category of Non Essential Documents. Non Essential Documents are not required to be retained unless otherwise decided by the HoD.

Any questions as to the specific category as to which particular Document other than those specified in Annexure I should be clarified from the Compliance Department.

## 7 Document Retention methodology

The Documents should be retained in a live environment, which can be accessed by an authorized user in the ordinary course of business, based on certain aspects such as the need for documents to resolve queries, inter-department requests and responses to on-going audit requirements and requisition of data/information from regulators.

## 8 Document Archiving methodology

- 1) The Documents should be archived as secured storage of data/ documents, such that the same is rendered inaccessible by users in the ordinary course of business, but which can be retrieved by POC for the document in question. The access can be provided, based on certain aspects such as compliance with statutory and regulatory requirements, responses to queries or inspections from regulator and availability of documents for any statutory assessments. All such accesses must be recorded to be preserved as audit trail. Document shall be archived differently for physical and electronic documents
- 2) Physical documents shall be archived through '*Document and record management company*'. The said company shall be responsible for systematically archiving the documents basis the terms and conditions prescribed in the contract. The procedure for archiving such documents is laid down in the "Standard Operating Procedure (SOP) for Physical Storage of Documents at Stock Holding Document Management Services Limited".
- 3) Electronic Documents shall be archived on the designated storage devices, back up appliances and tape back up as per the standard operating procedures under the IT Infra- System Support Group (SSG).

Archival shall comprise of a full featured transition for Physical Documents that are slated to be stored in electronic form. The procedure for conversion of Physical Documents to Electronic form comprises of the following steps:

- Document Preparation: Includes the logging the documents.
- Document Scanning: Includes the imaging and conversion from Physical to Electronic form
- Document Coding: Includes providing unique identification number for each document which can be easily tracked and retrieved as and when required.

- Document Indexing: Inclusion of coded data into files and meta-data.

The backend data should be periodically tested to ensure recovery without loss of transactions integrity.

## 9 Document Retrieval methodology

Request for retrieval of archived Document by any employee shall be approved by the respective HoD. The time for physical retrieval shall be as per the contract signed with the 'Document and record management company' engaged by NSDL.

When document in physical form is required to be retrieved, the "SOP for Physical Storage of Documents at Stock Holding Document Management Services Limited" shall be followed.

The IT Infra- SSG Team shall assist employees in retrieving documents (stored in Shared file drive) from electronically archived form to live environment as per the process laid down in the operation manuals.

## 10 Document Disposal methodology

No Document shall be destroyed notwithstanding the fact that the periodicity for which it is to be preserved has lapsed, if any enquiry, claim or litigation is pending in respect of any information contained in such Document.

Once records have been archived for the archival period, the same shall be prepared for Disposal, subject to request from the department and approval from HoD. The Documents retained or archived shall be reviewed every year or according to the need of the respective department and actions taken to destroy such Documents, which are due for Disposal.

Documents in all correspondence files both inward and outward should be scrutinized and only such of the papers as are not of any importance may be destroyed, the details of the Documents destroyed shall be recorded in a register electronically to be maintained by the respective department, wherein particulars of the Documents destroyed shall be entered, including but not limited to the following details:

- Name of Document
- Form of Document
- Particulars of the Document
- Month and Year in which Document was created

- Date of Disposal
- Mode of Disposal
- Requestor and request date
- Approver and approval date

Notwithstanding the above, the timelines specified for retention and retrieval shall not be applicable if the subject document/data/information is subject to any litigation/dispute/proceeding before any statutory authority/regulatory authority or any court of law till the disposal of the proceedings before the appropriate authorities.

## 11 Exception approval

Where any decision or proposition with respect to Document maintenance, results in Retention/ Archival Schedules not being in conformity with the schedule defined in this Policy, the same shall be approved as under:

<b>Exception</b>	<b>Approver</b>
Retention/ Archival Schedule for period higher than defined subject to SEBI LODR Regulations and other applicable laws	MD&CEO
Addition of new Document category and schedules subject to SEBI LODR Regulations and other applicable laws	

## 12 Policy review and revision

The Compliance Department of the Company shall be responsible for monitoring the implementation of this Policy. In case of any revision in the Policy, the same shall be carried out with the approval of the Board. Any difficulties or ambiguities in the Policy will be resolved by the MD&CEO in line with the broad intent of the Policy..

Any new regulation / circular issued by SEBI shall be deemed to have been included in the Policy immediately upon their issuance, without waiting for formal approval of the Board.

The provisions in the Policy are in addition to, and not in derogation of, other applicable laws.

## ANNEXURE I

Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
1)	ISO Audit Documents	All Departments	Electronic	2	10
2)	Office approval note	All Departments	Physical	8 years from completion	10
3)	Emails	All Departments	Electronic	1	Permanent
4)	Policies and SOPs	All Departments	Electronic	Permanent	Permanent
5)	Correspondence with SEBI, Exchanges and Statutory Authorities	All Departments	Original/ Physical/ Electronic	Physical / original - 8 years Electron ic- Perman ent	Permanent
6)	AIC-RART	All Departments	Physical/ Electronic	2	Permanent
7)	Audit Reports (Internal/External)	All Departments	Electronic	8	Permanent
8)	Change Management Form (internal)	All Departments	Physical / Electronic	1 year from completion	5
9)	Purchase Orders	All Departments	Physical/ Electronic	5 year from completion	Permanent
10)	MIS and management reports	All Departments	Electronic	2	10
11)	General Contracts	All Departments	Physical/ Electronic	3 years from the expiry or Termination of the contract	5
12)	E-Approval note	All Departments	Electronic	8 years from completion	10
13)	Resource Request forms(RR)	All Departments	Electronic	1	5
14)	Inward/ Outward Register	All Departments	Electronic	2	5
15)	Litigations	Legal & Compliance	Physical/ Electronic	3 years from disposal or closure of the litigation	5
16)	Any Court/NCLT orders and Notices/ Regulatory Directions/ Show Cause Notices and Orders passed by Regulators	Legal & Compliance	Physical/ Electronic	Permanent	Permanent
17)	Disclosure from Directors, KMP and Designated Persons under Code of Conduct	Legal and Compliance	Physical/ Electronic	8	10

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Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
18)	Arbitration Matters	Legal & Compliance	Physical/ Electronic	3 years from disposal or closure of the arbitration proceedings	5
19)	Documents relating to Investor Grievances	Investor Grievance	Physical	3 years from completion	10
20)	Documents relating to Investor Grievances - e-pass	Investor Grievance	Electronic	5 years from completion	10
21)	Registers for administrative activities	Admin	Original	2	8
22)	Work Instructions	Admin & INfra	Electronic	1 year from completion	3
23)	AMC Documents/Reports	Admin	Physical/ Electronic	3	5
24)	Asset List	Admin	Physical/ Electronic	3	5
25)	User Manuals	Admin	Physical/ Electronic	3	5
26)	Quotations From Vendors	Procurement	Physical / Electronic	1	5
27)	Department Budget	Admin	Physical	3	5
28)	Internal notes Recruitment, Resignation clearance form, Background reports, Employee Training , Salary details of new joinees and for annual increment, appraisal form etc.	Human Resource	Physical / Electronic	8 from date of resignation or cessation of employment	10 year for physical Permanent for electronic
29)	Filings with Regulatory Authority under Labour Law	Human Resource	Physical / Electronic	5	5
30)	OS hardening Check List	IT Infra	Physical / Electronic	1	5
31)	Policy circular to issuers	Issuer Interface	Electronic	2	Permanent

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Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
32)	User Management Form	Issuer Interface	Physical /	2	Permanent
33)	Approval Notes-ISO related	Issuer Interface	Physical / Electronic	2	Permanent
34)	Quotations Received from Insurance Brokers and Insurance Policy document	Risk Management	Electronic	5	Permanent
35)	Tripartite agreement with issuers, RTA, clearing members and any change thereof	Issuer Interface/ Participant Registration & Issuer Admission	Physical/ Electronic	3 years from the expiry or Termination of the contract	Permanent
36)	a)Company Admission & ISIN related Documents b) Additional ISIN related documents	a)Participant Registration and Issuer Admission b)Issuer Interface	Physical/ Electronic	5	Permanent
37)	Communication letters	Issuer Interface	Physical/Electronic	5	Permanent
38)	GSEC ISIN Activation Files, VFT Files, Physical Demat Conversion files, IG, reconciliation Files, Ipay/Redemption Files	Issuer Interface	Physical/ Electronic	5	Permanent
39)	NSCKVP IG Files, Bill to DoP Files, Correspondence Files, Redemption Files	Issuer Interface	Physical/ Electronic	5	Permanent
40)	RBI Compliance and correspondence	Issuer Interface	Physical/ Electronic	5	Permanent
41)	Agreement with CC	Settlement team (Operations)	Physical/ Electronic	3 years from termination or expiry	Permanent
42)	Documents received from CC	Settlement team (Operations)	Physical / Electronic	5	Permanent
43)	Speede Agreement with DP	Settlement team (Operations)	Physical/ Electronic	3 years from termination or expiry	Permanent

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Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
44)	Documents received for Speede	Settlement team (Operations)	Physical/ Electronic	5	Permanent
45)	Request and documents for DSC mapping for eservices	Settlement team (Operations)	Physical/ Electronic	5	Permanent
46)	SPICE request document	Settlement team (Operations)	Physical/ Electronic	5	Permanent
47)	IDEAs CM Approval	Settlement team (Operations)	Physical/ Electronic	5	Permanent
48)	IDEAs CM activation documents received from CM	Settlement team (Operations)	Physical/ Electronic	5	Permanent
49)	Documents received from DP	Participant Registration & Issuer Admission	Physical/ Electronic	5	Permanent
50)	Procurement approvals	IT Security	Electronic	2	8
51)	SOC Reports	IT Security	Electronic	2	8
52)	Network Architecture diagrams	IT Security	Electronic	2	8
53)	VAPT reports	IT Security	Electronic	2	8
54)	Security awareness training records	IT Security	Electronic	2	8
55)	Incorporation documents,  Memorandum and Articles of Association  Minutes of Board, its Committees, General Meetings, including minutes of the meetings conducted through Postal Ballot	Secretarial	Physical / Electronic	Permanent	Permanent

Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
56)	<p>Statutory Registers maintained under the Companies Act,</p> <p>Resolutions passed through circulation</p> <p>Disclosure of Interest by a Director Attendance Register for the meeting of the Board and its Committees</p> <p>Office copies of Notices, Agenda, Notes on Agenda and other related papers</p> <p>Office copies of Notices, scrutiniser's report and related papers</p> <p>Various Forms and Returns filed with RoC including copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto</p> <p>Certificates issued by the Registrar of Companies (ROC)</p> <p>Stock Exchange filings including annexures</p> <p>Stock Exchange Listing permissions</p>	Secretarial	Physical / Electronic	8	Permanent
57)	<p>Accounts vouchers, vendor bills, approval notes, financial statements, IT returns, other Tax returns etc.</p> <p>Tally / Accounting software backup.</p> <p>Assessment submissions, appeal papers, communication with tax departments etc.</p> <p>Book of Accounts</p>	Finance and Accounts	Physical / Electronic	8	Permanent

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Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
58)	GST returns and fillings	Finance and Accounts	Electronic	6	Permanent
59)	e-Voting agreements Reference Data Agreements IOAP On-Boarding Documents	Business Development and Products (BDP)	Electronic	3 years from termination or expiry of contracts	5
60)	Policy Circulars, Routine Circulars, Bye Laws and Business Rules including amendments, DP Communications	Participant Services (Operations)	Electronic	Permanent	Permanent
61)	Depository Participant and other tripartite Agreement/ Contracts	Participants Registration & Issuer Admission	Physical/ Electronic	3 years from termination or expiry of contracts	Permanent
62)	MDR & other reporting	Legal & Compliance	Electronic	5	Permanent
63)	SEBI Communications	Legal and Compliance	Physical / Original	5	Permanent
64)	Custody Value Monitoring related communications / approvals	Participant Services (Operations)	Electronic	5	Permanent
65)	Presentations	Marketing & Corporate Communications	Original, Physical/ Electronic	Electronic copy - 5 yrs. Original and Physical copy (if any) 3 years	Not required
66)	Publications	Marketing, & Corporate Communications and Investor Protection	Original/ Electronic	Electronic copy - 5 yrs. Original copy (if any) 3 years	not required
67)	Marketing Collaterals	Marketing & Corporate Communications	Original/ Electronic	Latest sample to be maintained in original and electronic form	Not Required
68)	IAP proposal and approvals	Investor Protection	Electronic	5 years	Not Required

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Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
69)	SEBI , SAT, Income Tax, DRT, Police, ED, GST, Court and other authorities letters , orders , queries etc.	Inspection and Surveillance	Original / Electronic	3	Permanent
70)	Correspondence letters with SEBI, Exchanges , DP , Depository, Client, income tax authorities, FIU, other statutory authorities etc.	Inspection and Surveillance	Original / Electronic	10	Permanent
71)	Audit & Inspection reports of Depository Participants and Registrar and Share Transfer Agents (RTAs)	Inspection	Electronic	10	10
72)	Data in soft form - Surveillance Alerts data , Reports ,MIS, Emails, etc.	Inspection and Surveillance	Electronic	10	10
73)	Change Management Form (Vendor)	Information Technology	Physical / Electronic	1 year from completion	5
74)	Release Documents	Information technology	Electronic	5	5
75)	User Management Records for Department maintained Servers - Bugzilla Application, , DOC Server	Information technology - Depository Services	Electronic	2	3
76)	User Management Records for DM Application	Information technology - Depository Services	Electronic	2	5
77)	User Management Records for eServices Application	Information technology - Value Added Services	Electronic	2	5
78)	Nessus Vulnerability Report	IT Security	Electronic	1	5
79)	Business partner recovery/ Refunds(IOM)	Infra - Network	Electronic	5	Permanent
80)	Server and Assets Inventory ( HCIS )	IT Infra	Electronic	2	5
81)	Software and Hardware AMC and Support tracker	Procurement	Electronic	1	5

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Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
82)	Monthly ARCOS user list / review report	IT Security	Electronic	1	5
83)	Checklist ie DR shifting , DR revert, Handover checklist Etc	IT Operations, Data Center	Physical / Electronic	5	5
84)	Backup Register	IT Infra	Electronic	1	5
85)	User Management Form	Information Technology	Electronic	5	5
86)	Dept. Budget	Information Technology	Electronic	5	5
87)	Dedupe Report	Surveillance	Electronic	5	5
88)	DRP Manual	IT Operations, Data Center	Electronic	5	--
89)	DRP Reports and Checklist	IT Operations, Data Center	Electronic	5	--
90)	Disaster Recovery training attendance	IT Operations, Data Center	Electronic	5	---
91)	AMC CAS Billing	BDP	Electronic	5	Permanent
92)	Training related documents	BDP	Physical / Electronic	5	Permanent
93)	Digital LAS Billing	BDP	Electronic	5	Permanent
94)	STeADY client application form and supporting documents	BDP	Physical / Electronic	5	Permanent
95)	e-CAS/ p-CAS along with Proof of Dispatch and proof of Returned Undelivered (Maintained in Electronic Form)	Information Technology-Data Technology for e-CAS / Admin for p-CAS	Electronic	1	8

Sr. No	Description of Documents	Department	Category of Document	Retention Period (yrs)	Archival Period (yrs)
96	Records of securities dematerialized and rematerialized;	Information Technology-Data Technology	Electronic	8	Permanent
97	The names of the transferor, transferee, and the dates of transfer of securities;	Information Technology-Data Technology	Electronic	8	Permanent
98	A register and an index of beneficial owners;	Information Technology-Data Technology	Electronic	8	Permanent
99	Details of the holding of the securities of beneficial owners as at the end of each day;	Information Technology-Data Technology	Electronic	8	Permanent
100	Records of instructions received from and sent to participants, issuers, issuers' agents and beneficial owners;	Information Technology-Data Technology	Electronic	8	Permanent
101	Records of approval, notice, entry and cancellation of pledge or hypothecation, as the case may be;	Information Technology-Data Technology	Electronic	8	Permanent
102	Details of participants;	Information Technology-Data Technology	Electronic	8	Permanent
103	Details of securities declared to be eligible for dematerialization in the depository	Information Technology-Data Technology	Electronic	8	Permanent