

Record Retention, Disposal and User Information Privacy Policy

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EQX Analytics Pvt Ltd

Record Retention, Disposal, and User Information Privacy Policy

1. Introduction

The Companies Act, 2013 ("Act") read with the Rules ("Rules") framed under the Act contain provisions for maintenance of various documents including registers and records by the Companies; the place at which such documents are to be maintained and the period for preserving such documents.

This policy outlines the commitments of EQX Analytics Pvt Ltd ("the Company") regarding the handling, retention, disposal, and privacy of user information. As a company that prioritizes data security and user privacy, we do not store any data on our platforms or servers. Our role is limited to the secure transmission of data directly to designated lenders, adhering strictly to the applicable legal requirements.

2. Scope

The objective of this Policy is preservation of documents of EQX Analytics Private Limited (the "Company" or "EQX") in compliance with the requirements of the Companies Act, 2013 read with applicable Rules framed under the Act. This Policy sets the standards for classifying, managing and storing the records of the Company.

3. Data Transmission and Handling

- **Data Transmission Security:** All data transmitted through our platform is encrypted using industry-standard security protocols. We ensure that data is securely transferred to the intended lending institutions without intermediate storage.
- **Third-Party Services:** Only reputable and compliant third-party services are used for data transmission purposes, ensuring that they adhere to similar standards of data protection.

4. Data Retention

4.1. Data Retention for Users:

- **No Data Storage:** Consistent with our commitment to user privacy, we do not store any user data on our platforms or servers. Data is transmitted directly to the relevant lending institutions.

- **Temporary Caching:** If temporary caching of data occurs during transmission, such data is held only as long as necessary to ensure successful data transfer and is then immediately purged from our systems.

4.2. Data Retentions as per Regulatory Norms:

The Company shall maintain and preserve register and records, books and/ or paper, books of accounts and other documents etc. as follows:

- a) Schedule I – to be preserved as per the Companies Act, 2013
- b) Schedule III – Other Records Categories

Documents to be maintained under this Policy shall be preserved in physical or in Electronic Form/ Mode as per the provisions of the Act and Rules.

The Documents not covered under the schedules above may be preserved for the period as prescribed under the relevant statute. However, in the case of pending matters/litigation/disputes, the documents shall be preserved till the resolution of pending matter/litigation/dispute.

5. Data Disposal

- **Secure Disposal Practices:** Any temporary copies of data created during transmission are securely and irreversibly destroyed after their necessity has ended, in accordance with best practices in data disposal.
- **Audit and Compliance:** Regular audits are conducted to ensure that all data handling and disposal practices are compliant with this policy and any applicable laws.

The documents specified in Schedule II & III to this Policy, kept by the Company, may be destroyed after the expiration of the period specified in the respective Schedules. The documents not specified in the schedules shall be destroyed after the period of five years. However, in the case of pending matters/litigation/disputes, the documents shall be preserved till the resolution of pending matter/litigation/dispute. The documents shall be destroyed after taking the approval of respective Department Head.

6. User Privacy

- **Information Collection:** The only user information collected is that which is necessary for the successful transmission of data to lending institutions.

- **Use of Information:** Collected information is strictly used for the purpose of data transmission to the designated lenders and not for any other purpose without explicit user consent.

7. Compliance with Legal Requirements

- **Regulatory Compliance:** The company adheres to all relevant local, national, and international laws regarding data protection and privacy.
- **Data Protection Officer:** A Data Protection Officer (DPO) is appointed to oversee compliance with this policy and relevant data protection laws.

8. Amendments to the Policy

This policy may be updated or amended from time to time to maintain compliance with legal standards and best practices. All stakeholders will be notified of significant changes.

SCHEDULE I

Sl. No.	Name of Documents	Period specified under the law
1	All Documents and Information as originally filed with the Registrar of Companies for Incorporation of Company [Section 7(1)].	Permanent
2	Memorandum and Articles of Association, duly updated from time to time [Section 15]	Permanent
3	Register of Renewed and Duplicate Share Certificate (Form SH-2) [Section 46 & Rule 6(3) of Chapter IV]	Permanent
4	Books and documents relating to the issue of share certificates including blank forms of share certificates [Section 46 and Rule 7 of Chapter IV]	Thirty years. But in case of disputed cases, permanently
5	Register of Transfer and Transmission [Section 56]	Permanent
6	Register of Charge (Form CHG-7) [Section 85 & Rule 10 of Chapter VI]	Permanent
7	Register of Members including foreign register, if required (with index of names if no. of members is not less than 50) (Form MGT-1) and Record of Beneficial Owners	Permanent
8	Minutes of Board Meeting and other Committee Meetings of the Board and resolutions passed by Circulation Minutes of the General Meetings of class of shareholders / creditors or resolutions passed by way of postal ballots. [Section 118, 119 & Rule 25 of Chapter VII] Books and Papers of Amalgamated Companies [Section 239]. Minutes of all Meetings of the transferor company, as handed over to the transferee company. [SS-1 & SS-2]	Permanent
9	Register of Investments made by Company not held in its own name (Form MBP-3) [Section 187 & Rule 14 of Chapter XII]	Permanent
10	Instrument creating Charge or Modification thereof [Section 85 and Rule 10 of Chapter VI]	Eight years from the date of Satisfaction of Charge
11	Register of Debenture Holders or other security holders (Form MGT-2) [Section 88 (1) (a) and Rule 4,5,6 of Chapter VII]	Eight years after the redemption of debentures or other security holders

12	Books of Accounts and Balance Sheet and Profit and Loss Statement [Section 128(5)]	Eight years from the date of filing with the Registrar
13	Notice of Interest by Directors and Key Managerial Personnel [Section 184(1) and Rule 9(3) of Chapter XII]	Eight years from the close of relevant financial year
14	Attendance Register of Meetings of the Board and Committees [SS-1 – Clause 4.1.7]	Eight years from the close of the relevant financial year
15	Office copies of Notices, Agenda, Notes on Agenda and other related papers of the transferor company, as handed over to the transferee company [SS-1 – Clause 8.2]	At least eight financial years
16	Office copies of Notices, Agenda, Notes on Agenda and other related papers of the transferor company, as handed over to the transferee company [SS-1 – Clause 8.2]	As long as they remain current or for eight financial years, whichever is later
17	Office copies of Notices, scrutiniser's report, and related papers of the transferor company, as handed over to the transferee company [SS-2 – Clause 18.2]	As long as they remain current or for eight financial years, whichever is later
18	Attendance register of general meeting [Section 118 & Rule 27 of Chapter VII]	At least eight financial years
19	Register of Proxies [Section 105 & Rule 19 of Chapter VII]	At least eight financial years

SCHEDULE II

Business Area	Record	Disposal Policy
Corporate Governance	Records on establishment and development of the organization's legal framework and governance	8 years after the end of life of the organization
	Litigation with third parties	8 years after the settlement of a case
	Information Security Records	5 Years

	IT Records	3 Years
	Audit reports	8 years from completion
Financial Management	Financial records	8 years after the date of signing of accounts or, as applicable,
	Property acquisition (purchase, donation, rental, transfer) Deeds and certificates	8 years after the end of ownership/asset liability period
	Property leases	15 years after expiry
	General contracts and agreements	8 years after contract termination
	Unsuccessful tender documents	1 year after tender awarded
Human Resource Management	Job applications and interview records for unsuccessful applicants	6 months after the interview
	Payroll records – salaries and other payments through payroll	6 years
	Payroll records - Maternity, Paternity	3 years after the end of the tax year
	A summary of the record of service e.g. name, position, dates of employment, pay	6 years after the end of employment
	Timesheets, pay records and supporting documents such as contracts and contractual letters for employees charged to awards	5 years after payment of award balance
	All other HR documents	1 year after the end of employment