

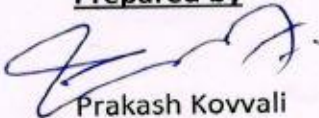
BASAN EQUITY BROKING LIMITED

POLICY FOR VOLUNTARY FREEZING OF ONLINE ACCESS OF CLIENT'S TRADING ACCOUNT

Version 1
Dated April 01, 2024



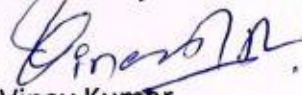
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Policy for voluntary freezing of client's online access

Introduction:

In order to enhance the ease of doing business and ease of doing investments for investors and to enhance protection of investors from suspicious activities; SEBI, has vide its circular ref no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 has mandated that a framework shall be laid down by stock exchanges for trading members to provide the facility of voluntary freezing blocking the online access of the trading account to their clients.

Purpose:

To protect clients' accounts from unauthorized access and potential fraud by temporarily freezing accounts when unusual activity is detected.

Policy

1. Detection of Unusual Activity:

Unusual activity includes, but is not limited to, large or suspicious transactions, multiple failed login attempts, login from unrecognized devices or locations, or sudden changes in trading patterns. The firm will utilize automated systems and algorithms to monitor for such activity 24/7.

2. Immediate Freeze:

When unusual activity is detected, the account will be immediately frozen to prevent further transactions.

Clients will receive an instant notification via email and SMS informing them of the freeze and the reason for the action.

3. Verification Process:

- Clients must verify their identity to unfreeze the account. This may include:
- Answering security questions.
- Providing identification documents.
- Confirming recent transactions.

4. Investigation:

- The firm's security team will investigate the unusual activity to determine if it is fraudulent.
- Clients will be updated on the progress and outcome of the investigation.

5. Resolution and Unfreeze:

- If the activity is deemed legitimate, the account will be unfrozen and clients will be able to resume normal activities.
- If the activity is found to be fraudulent, the firm will take appropriate action, which may include working with law enforcement and ensuring that no unauthorized transactions affect the client's account.

6. Client Responsibility:

- Clients are responsible for maintaining the security of their login credentials.
- They should regularly update their passwords and be vigilant about any suspicious communications or activities.

7. Support:

- A dedicated support line will be available 24/7 to assist clients with frozen accounts and to help them through the verification process.
- Clients can reach support at the following contact details:
 - Mobile Number: 9861645000
 - Email ID: helpdesk@basanonline.com

Review and Updates:

- This policy will be reviewed annually and updated as necessary to adapt to new threats and technological advancements.

Implementation:

1. Training:

- All staff, especially those in customer service and security, will be trained on the new policy and procedures.

2. Communication to Clients:

- The policy will be communicated to all clients through email, the brokerage firm's website, and during the on boarding process for new clients.

3. System Integration:

- Ensure that all monitoring and notification systems are integrated and functioning correctly to detect unusual activities and alert both the client and security team promptly.

Implementing such a policy helps ensure the security and trust of clients while protecting the brokerage firm from potential fraud and unauthorized activities.