

POLICY ON DATA RETENTION AND DATA DISPOSAL

➤ INTRODUCTION

MLB Stock Broking Private Limited (refer to as 'MLB' hereinafter) recognizes and understands that the efficient management of its data and records is necessary to support its core business functions, to comply with its legal, statutory and regulatory obligations, to ensure the protection of personal information and to enable the effective management of the organization.

Information held for longer than is necessary carries additional risk and cost and can breach data protection rules and principles. MLB only ever retains records and information for legitimate business reasons and use and we comply fully with the regulatory data protection laws and guidance.

➤ PURPOSE:

The purpose of this policy is to set out the length of time the records should be retained, the processes for disposing of records, how MLB provides a structured and compliant data and records management system. We define 'records' as all documents, regardless of the format; which facilitate business activities, and are thereafter retained to provide evidence of transactions and functions.

Such records may be created, received or maintained in hard copy or in an electronic format with the overall definition of records management being a field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use, distribution, storage and disposal of records.

➤ SCOPE:

This policy applies to all staff within hi-impact (meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with hi-impact in the UK or overseas). Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

➤ NECESSITY:

- Effective and adequate records and data management is necessary to: -
- Ensure that the business conducts itself in a structured, efficient and accountable manner
- Ensure that the business realises best value through improvements in the quality and flow of information and greater coordination of records and storage systems
- Support core business functions and provide evidence of conduct and the appropriate maintenance of systems, tools, resources and processes
- Meet legislative, statutory and regulatory requirements
- Deliver services to, and protect the interests of, employees, clients and stakeholders in a consistent and equitable manner
- Assist in document policy formation and managerial decision making
- Provide continuity in the event of a disaster or security breach

- Protect personal information and data subject rights
- Avoid inaccurate or misleading data and minimize risks to personal information
- Erase data in accordance with the legislative and regulatory requirements.

➤ **PERSONAL INFORMATION AND DATA PROTECTION**

MLB needs to collect personal information about the people we employ, work with or have a business relationship with, to effectively and compliantly carry out our everyday business functions and activities, and to provide our products and services. This information can include (but is not limited to), name, address, email address, data of birth, IP address, private and confidential information, sensitive information, financial details, Demat details and bank details.

In addition, we may occasionally be required to collect and use certain types of personal information to comply with the requirements of the law and/or regulations, however we are committed to collecting, processing, storing and destroying all information in accordance with the regulatory data protection law and any other associated legal or regulatory body rules or codes of conduct that apply to our business and/or the data/information we process and store.

➤ **OBJECTIVES**

A record is information, regardless of media, created, received, and maintained which evidences the development of, and compliance with, regulatory requirements, business practices, legal policies, financial transactions, administrative activities, business decisions or agreed actions. It is MLB's objective to implement the necessary records, management procedures and systems which assess and manage the following processes: -

- The creation and capture of records
- Compliance with legal and regulatory requirements
- The storage of records
- The protection of record integrity and authenticity
- The use of records and the information contained therein
- The security of records
- Access to and disposal of records

➤ **PROCEDURES**

MLB manages records efficiently and systematically, in a manner consistent with the regulatory requirements. Records management training is mandatory for all staff and this policy is widely disseminated to ensure a standardised approach to data retention and records management.

Records will be created, maintained and retained to provide information about, and evidence of MLB's business transactions, customers, employment and activities. Retention schedules will govern the period that records will be retained.

➤ RETENTION PERIODS AND PROTOCOLS

All records retained during their specified periods are traceable and retrievable. Any file movement, use or access is tracked and logged, including inter-departmental changes. All company and employee information is retained, stored and destroyed in line with the regulatory guidelines.

For all data and records obtained, used and stored within MLB, we: -

- Carry out periodical reviews of the data retained, checking purpose, continued validity, accuracy and requirement to retain
- Establish periodical reviews of data retained
- Establish and verify retention periods for the data

➤ EXPIRATION OF RETENTION PERIOD

Once a record or data has reached its designated retention period date, the designated officer should refer to the data register for the action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymise the data in accordance with the regulatory requirements or to archive records for a further period.

➤ DESTRUCTION AND DISPOSAL OF RECORDS AND DATA

- 1) All information of a confidential or sensitive nature on paper or electronic media must be securely destroyed when it is no longer required. This ensures compliance with the Data Protection laws and the duty of confidentiality we owe to our employees, clients and customers.
- 2) MLB is committed to the secure and safe disposal of any confidential waste and information assets in accordance with our regulatory obligations and that we do so in an ethical and compliant manner. We confirm that our approach and procedures comply with the regulatory laws and provisions and that staff are trained and advised accordingly on the procedures and controls in place.
- 3) Due to the nature of our business, MLB retains paper based personal information and as such, has a duty to ensure that it is disposed of in a secure, confidential and compliant manner. The disposal is made from shredding machines available in the office.
- 4) Critical data / information on devices are removed by using methods such as crypto shredding / degauss / Physical destruction as applicable.
- 5) The specific deletion or destruction process shall be carried out by the designated officer.
- 6) Upon receiving a request to erase data/information, we first ensure that no other legal obligation or legitimate interest applies. If we are confident that the data/information has the right to be erased, this is carried out by the Designated Officer. This should be done in conjunction with the department manager and technical department to ensure that the data/information has been destroyed.

- 7) The request is reviewed to ensure it complies with one or more of the grounds for erasure: -
- a) the data / information is no longer necessary in relation to the purposes for which it was collected or otherwise processed
 - b) the data subject has withdrawn consent on which the processing is based and where there is no other legal ground for the processing
 - c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing the data / information has been unlawfully processed
 - d) the data / information must be erased for compliance with a legal obligation
- 8) If the destruction request complies with one of the above grounds, it is erased within 30 days of the request being received.

➤ **COMPLIANCE AND MONITORING**

MLB is committed for ensuring the continued compliance with this policy and any associated legislation and undertake regular audits and monitoring of our records, management, archiving, retention and destruction.