

NIVA BUPA HEALTH INSURANCE COMPANY LIMITED

DATA RETENTION AND ARCHIVAL POLICY

Reference No.: THE COMPANY/IS/POL/DRP

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DATA RETENTION AND ARCHIVAL POLICY

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04-01-2022	1.2	Updated CRO and CTO name			
12-04-2022	1.3	<ol style="list-style-type: none"> 1. Included requirements from Securities And Exchange Board Of India (Listing Obligations And Disclosure Requirements) Regulations, 2015 2. Addition in Annexure for claims more than 20 Lakhs, data retention time period of 12 years. 3. Removal of clause for Web Aggregators 			

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14-04-2024	1.4	<ol style="list-style-type: none">1. Included revised Anti-Money Laundering guidelines effective from Jan 1, 2023.2. IRDAI Minimum Information Required for Investigation and Inspection Regulations 20203. 3 Removal of clause for Anti-Money Laundering/Counter Financing of Terrorism (AML/CFT)			

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1 PREAMBLE

- 1.1 Niva Bupa Health Insurance Company Limited (“the **Company**” or “**Niva Bupa**”) has formulated this data retention and archival policy (“**Policy**”) to ensure that all documents/ information of the Company is preserved, archived, and their retention is done as per the Policy.
- 1.2 This Policy is guided by the principles and objectives as enumerated in Regulation 9 read with Regulation 30 (8) and Regulation 46 of the SEBI LODR Regulations and Companies Act, 2013 and all other applicable provisions, made thereunder, as amended from time to time.
- 1.3 Any accidental or intentional destruction of the records prior to their specified retention periods can pose various types of business risks and may result in increased storage costs with reduce performance of the company's information systems.

2 PURPOSE

- 2.1 This Policy aims to enhance transparency, accountability, and better relationship with stakeholders, by providing for framework for disclosure of required information/ events on the website of the Company.
- 2.2 This Policy provides a framework for ensuring that information relating to the Company is adequately disclosed on its website as required by law and archived for a specified period, to facilitate retrieval, if required.
- 2.3 The Policy shall ensure systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business of the Company.

3 DEFINITIONS

- 3.1 In this Policy, the following words and expressions shall have the meanings set forth below:

"Anonymization" is the process of turning data into a form which does not identify individuals. It is a type of information sanitization whose intent is privacy protection;

"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;

"Board" means the Board of directors of the Company or any of the Committees constituted by it;

"Books of Account" as per Section 2(13) of the Companies Act includes records maintained in respect of—

- (a) all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place;
- (b) all sales and purchases of goods and services by the Company;
- (c) iii. the assets and liabilities of the Company; and

- (d) the items of cost as may be prescribed under Section 148 in the case of the Company which belongs to any class of Companies specified under that section;

"Company"/ or "Niva Bupa" means Niva Bupa Health Insurance Company Limited (formerly known as Max Bupa Health Insurance Company Limited);

"Documents" means and includes summons, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, books, papers, certificates, contracts, records, files, tapes, CDs, DVDs, electronic storage devices, statutory records, registers and or any other record, required under or in order to comply with the requirements of the Companies Act and rules made thereunder, or other applicable laws maintained on paper or in electronic form, pursuant to Section 2(36) of the Companies Act, and does not include multiple or identical copies;

"Electronic Records" means the electronic record as defined under Clause (t) of sub-Section (1) of Section 2 of the Information Technology Act, 2000 and shall include data, record or data generated, image or sound stored, received or sent in an electronic form or micro film or computer generated micro fiche;

"Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it;

"Maintenance" means keeping Documents, either physically or in Electronic Form;

"Metadata" means data that provides information about other data;

"PCI-DSS" means Payment Card Industry Data Security Standard, an information security standard for organizations that handle branded credit cards from the major card schemes;

"Personal data" means information relating to an identified or identifiable natural person, who can be identified, either directly or indirectly, in combination with other available or likely available information, particular by reference to an identifier such as a name, and identification number, location data, and online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed;

"Records" means any register, index, agreement, memorandum, minutes or any other document required by the Companies Act or the rules made there under to be kept by a Company pursuant to Rule 27 of the Companies (Management and Administration) Rules, 2014;

"SEBI LODR Regulations" means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, as amended from time to time.

- 3.2 Capitalised terms used in this Policy and not defined above shall have the same meaning as assigned to them under the SEBI LODR Regulations or any other applicable law.

4 HOSTING ON COMPANY WEBSITE

- 4.1 The Company shall disclose on its website all such events or information which has been disclosed to the concerned stock exchanges in compliance with the SEBI LODR Regulations and such disclosures shall be hosted on the website of the Company for a minimum period of 5 (five) years and thereafter as per para [6] of this Policy. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of SEBI LODR Regulations will be hosted on the bottom link of the website of the Company www.nivabupa.com under the section "Investor Disclosures".
- 4.2 The respective functional heads will be responsible for ensuring that the information supplied to the IT Department for uploading on the Company's website is correct, complete and kept current at all times. They will be responsible for ensuring that any changes required to be made to keep the information updated is promptly conveyed to the IT Department, in any case not later than one working day.
- 4.3 The Company Secretary or Compliance Officer appointed under the Regulations will be responsible for ensuring that all information required to be statutorily disclosed on the Company's website is promptly provided to the Corporate Communications Department for uploading on the website and that the same is correct, complete and kept updated at all times. Any change in the content of its website shall be updated by the Corporate Communications Department within 2 (two) working days from the date of such change in content.

5 ROLES AND RESPONSIBILITIES

- 5.1 The Head - IT of the Company will be responsible for ensuring adherence with this Policy. Chief Information Security Office ("CISO") will ensure continuous evaluation and monitoring of the execution of this Policy
- 5.2 For enforcing retention in accordance with this Policy, each function is responsible for the records and documents it creates, uses, stores, processes and destroys. The respective functional heads/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of functions falling under the charge of each of them, in terms of this Policy.
- 5.3 Where a particular authorised person tenders his/ her resignation or is transferred from one location of the Company to another, such person shall, before such resignation or transfer becoming effective, hand over, to his/ her successor, all the relevant documents (whether in electronic form or otherwise) in his/her custody pursuant to this Policy together with any relevant passwords, lock and key, and any devices in his/ her possession used to store such documents.

6 PRESERVATION OF DOCUMENTS

- 6.1 The standards for managing, storing and preservation of documents of the Company, broadly classified in the following two categories:
- 6.1.1 The documents of a permanent nature (listed in **Annexure - I**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- 6.1.2 The documents to be maintained and preserved for a specified time period (listed in **Annexure-II**) shall be preserved by the Company temporarily¹ subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than 8 (eight) years after completion of the relevant transaction. Provided further that the Company may keep the documents as specified above in an electronic mode.
- 6.1.3 In view of Rule 5 of the Prevention of Money Laundering (Maintenance of Records) Rules, 2005 ("**PML Rules**"), the Company shall be required to maintain the information/records of types of all transactions [as mentioned under Rules 3 and 4 of PML Rules as well as those relating to the verification of identity of clients for a period of 5 (five) years. The records shall be maintained for a period of 5 (five) years from the date of transaction.
- 6.1.4 Records pertaining to all other transactions, (for which the Company are obliged to maintain records under other applicable legislations/regulations/rules), the Company is directed to retain records as provided in the said legislation/regulations/rules but not less than for a period of 5 (five) years from the date of end of the business relationship with the customer.
- 6.1.5 As per Regulation 24 of the IRDAI Minimum Information Required for Investigation and Inspection Regulations, 2020, the records shall be maintained either for a minimum period of 10 (ten) years or as per the extant legal requirements, if any, applicable, whichever is later: from the date of last transaction on the respective records, or from the date of expiry of the Policy.
- 6.16 As per the law of limitation, all the Company Records need to be preserved for a minimum period of 3 (three) years.
- 6.17 In all cases where there are legal, arbitral or other judicial, quasi-judicial or proceedings under mediation, conciliation or other form of dispute resolution, all relevant documents and pleadings and records of proceedings shall be preserved for a period of 3 (three) years from the final conclusion of the relative proceedings.

7 DOCUMENTS IN ELECTRONIC FORM

- 7.1 Pursuant to Section 120 of the Companies Act read with Rule 27 of the Companies (Management and Administration) Rules, 2014. The documents in electronic form shall be maintained in following manner:
- 7.1.1 the records are maintained in the same formats and in accordance with all other requirements as provided in the Companies Act or the rules made there under;
- 7.1.2 the information as required under the provisions of the Companies Act or the rules made there under should be *adequately recorded for future reference*;
- 7.1.3 the records must be capable of being readable, retrievable and reproducible in printed form;
- 7.1.4 the records are capable of being *dated and signed digitally* wherever it is required

¹ Revised AML guidelines effective from January 1, 2023

under the provisions of the Companies Act or the rules made there under;

- 7.1.5 the records, once dated and signed digitally, *shall not be capable of being edited or altered*;
- 7.1.6 the records shall be *capable of being updated*, according to the provisions of the Companies Act or the rules made there under, and the date of updating shall be capable of being recorded on every updating.
- 7.1.7 E-mail records for the transactions from Finance, Legal, Marketing, Compliance and Customer Support departments in regard to the Company's customers shall be retained for period as specified below:
 - (a) Finance – 8 (eight) years
 - (b) Legal – 7 (seven) years
 - (c) Compliance – 5 (five) years
 - (d) Marketing – 3 (three) years
 - (e) Customer Support – 3 (three) years
- 7.1.8 Credit and Debit Card Data by Service Providers
 - (a) Processing of credit and debit card details of the Company's customers (hereinafter collectively referred to as "**Card Details**") shall comply by PCI DSS guidelines.
 - (b) The service providers/ payment gateways/ payment aggregators who process premium collection on behalf of the Company, may store such Card Details. The Company requires such service providers at all times during engagement must be PCIDSS certified and have required security measures in place, not less than those the standards as required under ISO/IEC 27001 or any similar certification notified from time to time.
 - (c) The service providers must mask the Card details while sharing the reports with the Company.
- 7.1.9 Maintenance of records in electronic form and security of electronic records:
 - (a) Pursuant to Rule 28 of the Companies (Management and Administration) Rules, 2014, the Company Secretary shall be responsible for the maintenance and security of electronic records and shall provide:
 - (i) adequate protection against unauthorized access, alteration or tampering of records;
 - (ii) ensure against loss of the records as a result of damage to, or failure of the media on which the records are maintained;
 - (iii) ensure that the signatory of electronic records does not repudiate the signed record as not genuine;

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- (iv) ensure that computer systems, software and hardware are adequately secured and validated to ensure their accuracy, reliability and consistent intended performance;
- (v) ensure that the computer systems can discern invalid and altered records;
- (vi) ensure that records are accurate, accessible, and capable of being reproduced for reference later;
- (vii) ensure that the records are at all times capable of being retrieved to a readable and printable form;
- (viii) ensure that records are kept in a non-rewriteable and non-erasable format like pdf. version or some other version which cannot be altered or tampered;
- (ix) ensure that at least one backup, taken at a periodicity of not exceeding 1 (one) day, are kept of the updated records kept in electronic form, every backup is authenticated and dated and such backups shall be securely kept at such places as may be decided by the Board;
- (x) limit the access to the records to the managing director, company secretary or any other director or officer or persons performing work of the Company as may be authorized by the Board in this behalf;
- (xi) ensure that any reproduction of non-electronic original records in electronic form is complete, authentic, true and legible when retrieved;
- (xii) arrange and index the records in a way that permits easy location, access and retrieval of any particular record;
- (xiii) take necessary steps to ensure security, integrity and confidentiality of records;
- (xiv) ensure and shall store media containing retained electronic documented information under the environmental conditions specified by the manufacturers / suppliers of the media.
- (xv) ensure that the records held in electronic media are held in data centres located and maintained within India.
- (xvi) ensure that reasonable controls will be put in place and maintained to ensure the integrity and longevity of retained electronic documented information.

8 DESTRUCTION OF DOCUMENTS

Subject to the provisions of the Companies Act read with rules made thereunder, the documents may be destroyed after the expiration of the period of their preservation. The Company Secretary shall maintain a Register wherein he shall enter brief particulars of the

records destroyed and shall certify by his own handwriting therein the date and mode of destruction.

8.1 Retention of other documented information

8.1.1 All other forms of documented information, either in electronic mode or otherwise, will be retained for at least the relevant maximum period set in legislation or regulation or contract for the material contained within the record.

8.1.2 Hard copy documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

8.1.3 Hard copy documents containing sensitive personal data, when not in use, should be stored in a locked cabinet or desk pedestal at all times.

8.1.4 With respect to the call records obtained from the call centres engaged by the Company for distance marketing of the insurance products, the call records shall be retained as per the retention schedule in the **Annexure-II**.

8.2 Retention of metadata

8.2.1 Where metadata is associated with an electronic record, the Company will take no action to delete such metadata, except where such action is an integral part of an action to delete the electronic record.

8.2.2 Metadata associated with electronic records shall be retained in-line with the retention period of original records as mentioned in **Annexure-II**.

8.3 Retention for cloud data

A clause for data retention and safe disposal of data in the cloud shall be included in the Service Level Agreements (SLAs) with the Cloud Service Provider as per the applicable laws and other regulatory, compliance and legal requirements.

8.4 Retention of Personal Data

8.4.1 Personal data shall not be kept in a form which permits identification of the data subject for longer than necessary for the purposes for which they were obtained or recorded. Personal data shall be erased when they have ceased to be necessary for the purpose for which they were obtained or recorded.

8.4.2 Previous erasure, the personal data shall be stored in a way which permits the right of access to be exercised.

8.4.3 Data may be stored for the duration of any kind of liability arising from legal relations or obligations or the execution of a contract or the application of pre-contractual measures requested by the data subject.

8.4.4 On a regular basis, the procedure for data retention shall be determined by local legislation and a retention schedule must be drawn up. On the expiry of such liability as stated above, data may only be stored following their dissociation.

8.4.5 Processing of Aadhaar card details of the Company customers shall comply by UIDAI guidelines. Further, the Company shall ensure that the first eight digits of the Aadhaar number properly masked and at no point in time, more than last four digits of the Aadhaar number of any individual should be stored by the insurers in physical or digital form.

8.5 Access to deleted documented information

Where access is requested (for example, pursuant to a Disclosure Order from Courts) to documented information that have been deleted, such documented information will only be retrieved if they exist at the time of the request within a back-up (e.g. on some back-up medium) and are identified as so existing before they are “purged” from the back-up in the normal course of processing (e.g. by overwriting of the record or any index to the record). Where they are so identified, they must be protected against subsequent overwriting.

8.6 Retention for audit, compliance or investigation

8.6.1 It may be necessary from time to time, to retain any and all electronic documented information pursuant to an internal or external audit, or because of known future or on-going compliance requirements, or because of suspected future or on-going investigations (including, but not limited to criminal proceedings, civil proceedings and tribunal hearings, or for other disclosure requirements).

8.6.2 Any such electronic & documented information will be retained for a period of 8 (eight) years or the relevant maximum period set in legislation or regulation or contract for the material contained within the record.

8.7 Retention of data for Web Aggregators and Insurance Brokers

All the books, documents, statements and contract notes maintained by the insurance broker shall be retained for a period of at least 7 (seven) years from the end of the year to which they relate as per Section 34(5) IRDAI (Insurance Brokers) Regulations, 2018.

8.8 Impact of deletion

8.8.1 In all cases, employees must be aware that their actions in deleting an electronic document may constitute a breach of this Policy and potentially of law or regulation or contract.

8.8.2 If there is any doubt, the employee must contact their manager or the departmental head for advice.

8.8.3 Unauthorized deletion may render the employee liable to dismissal and also to criminal or civil action.

8.9 Deletion, loss or inaccessibility of electronic documented information prior to expiry of retention period

8.9.1 In the event that electronic documented information are deleted, either accidentally or deliberately, or are lost (by whatever cause), or are rendered inaccessible (for example, by deterioration of the storage medium) a note will be made and retained in perpetuity, of the circumstances and, to the best of the Company’s ability, of the documented information that were deleted, lost, or rendered inaccessible.

8.9.2 In the above event, the Company Risk Management and IT Information Security team must be duly notified at the earliest opportunity by the owner of the data/information.

8.10 Maintenance of Records of Policies

8.10.1 The Company shall maintain and retain record of every policy issued and every claim made as per applicable law, in electronic form. It will be at discretion of the Company to maintain the records in any other format as well.

8.10.2 The Company shall maintain records of policies, and each record will include:

- (a) name and address of the policy holder
- (b) the date when the policy was effected
- (c) record of any transfer, assignment or nomination of which the insurer has notice

8.10.3 The Company shall maintain records of claims for each policy, and each record will include:

- (a) Details of the claim made (for instance the details of the policy, quantum of claim etc.)
- (b) date of claim
- (c) name and address of claimant
- (d) date on which the claim was discharged
- (e) in case of claim rejection, the date of rejection and grounds for rejection

8.10.4 The Company shall ensure that the records maintained are complete and accurate, and the systems maintaining the records have necessary security features.

8.10.5 The Company will ensure that backup systems are in place for data stored electronically

8.10.6 The Company will ensure that the records of policy and claim data are maintained in such a manner that fulfils the requirement of business and are easy to retrieve as and when required for policyholder servicing and compliance of applicable laws.

8.10.7 The Company will ensure that the archived records at different locations are identified and accessible at any time as per primary location.

8.10.8 The Company will ensure that the records are held in such a manner as may be required for business use and easy retrieval so as to support policyholder service and compliance with various laws, regulations, circulars, guidelines and any such other regulatory framework as applicable from time to time.

8.10.9 The Company will have a detailed plan to review the implementation of the maintenance and storage of records which will be overseen by the Risk Management

Committee.

8.11 Impact of Technology

8.11.1 The Company recognize that future changes in technology may adversely affect its ability to subsequently read those media upon which electronic documented information have been stored.

8.11.2 The Company will take reasonable, practical precautions to ensure the continued accessibility of the electronic documented information for the retention periods that apply to those documented information.

8.11.3 The Company will ensure that the systems used to store the records are protected from virus and unauthorized file executions. Antivirus software and other safety measures shall be updated periodically (preferably on a daily basis) and systems are scanned for virus/ malware/ spyware periodically.

8.11.4 The Company will ensure that the systems used for retention of records are included in the Company's periodic vulnerability scan cycle and all identified vulnerabilities are remediated.

8.11.5 The Company will ensure that all hardware and software products used for maintaining of records are registered with appropriate vendors for maintenance and are kept up-to-date in terms of upgrades and patches.

8.12 Deterioration of storage media

8.12.1 The Company will recognize that the media themselves may deteriorate and render the electronic documented information stored thereon unreadable.

8.12.2 The Company will take reasonable, practical precautions to ensure the continued viability of the electronic documented information for the retention periods that apply to those documented information.

9 POLICY COMMUNICATION AND REVIEW FREQUENCY

9.1 The Company shall review its Data Retention Policy on an annual basis, and/or in accordance with the changes in the provisions of the relevant Acts and Regulations.

9.2 Data Retention Policy shall be communicated to concerned personnel annually and whenever there are any modifications to this policy.

9.3 Disclosure of information about types of electronic documented information and how they are held.

9.4 There may be a positive obligation upon the Company early on in any action (before receipt of a Disclosure Order) to tell the "other party" and the Court about the types of electronic documented information (documents) within the Company control's, about the computer systems and other media upon which relevant documented information may be held. Such disclosure must be executed only after joint decision involving the Company Risk Management and Compliance and IT Information Security team.

9.5 Deletion and / or Anonymization of data

9.5.1 When the maximum retention period is reached, the User function must approach the chief compliance officer of Niva Bupa Health Insurance, the Company seeking its approval or advice on data anonymization or destruction with reference to the retention schedule.

9.5.2 The destruction and/or anonymization of the sensitive personal data or business information should be part of a carefully planned process, which has no negative impact on the integrity of the Company's data and systems, and on the continuity of the service delivery to our customers. Multiple copies of the data stored in different locations shall be destroyed as per retention timeframe.

9.5.3 Physical documents will be appropriately shredded using secured, locked consoles from which waste shall be periodically picked up by security screened personnel for disposal. No record shall be allowed to be taken outside the premises of the Company/ offsite location without being torn in to small shreds.

10 DOCUMENTED INFORMATION AND REFERENCES

- The Companies Act 2013
- Refer to Revised AML guideline 2023 detailed in section 6.1
- IRDAI Minimum Information Required for Investigation and Inspection Regulations 2020
- Master Circular on Anti Money Laundering/Counter- Financing of Terrorism (AML/CFT)- Guidelines for Life Insurers [IRDAI/SDD/GDL/CIR/175/09/2015]
- Acceptable Use Policy
- Asset management policy
- Policy for maintenance of records policy
- IRDAI Guidelines on Distance Marketing of Insurance Products 2011
- IRDAI Guidelines on Information Security and Cyber Security for insurers 2017
- Insurance Regulatory and Development Authority of India (Insurance Brokers) Regulations, 2018
- IRDAI (Third Party Administrators - Health Services) Regulations 2016
- IRDAI Guidelines on Appointment of Insurance Agents 2015
- E-Telecom Commercial Communications Customer Preference Regulations 2018
- Insurance Regulatory and Development Authority of India (Insurance Web Aggregators) Regulations 2017
- IRDAI (Maintenance of Insurance Records) Regulations 2015

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- The Insurance Act 1938
- Securities And Exchange Board Of India (Listing Obligations And Disclosure Requirements) Regulations 2015

ANNEXURE I | DOCUMENTS TO BE PRESERVED PERMANENTLY

#	Section / Rules	Description of document	Format	Place of maintaining document
1.	Section 7(4) of the Companies Act read with Rule 12 to Rule 18 of the Companies (Incorporation) Rules, 2014	Incorporation documents and information as originally filed with Registrar of Companies	-	Registered Office
2.	Section 42 of the Companies Act read with Rule 14 of the Companies (Prospectus and Allotment of Securities) Rules, 2014	Record of private placement offers	Form PAS 5	Registered Office
3.	Section 46 of the Companies Act read with Rule 6(3)(b) of the Companies (Share Capital and Debentures) Rules, 2014	Register of Renewed and Duplicate Share Certificates	Form no. SH-2	Registered Office /Registrars & Transfer Agent of the Company
4.	Section 56 of the Companies Act read with Rule 11 of the Companies (Shares Capital and Debentures) Rules, 2014	Register of Transfer and Transmission	-	Registered Office
5.	Section 62 of the Companies Act read with Rule 12 (10) of the Companies (Share Capital and Debentures) Rules, 2014	Register of Employee Stock Option	Form SH 6	Registered Office
6.	Section 68 (9) of the Companies Act read with Rule 17 of the Companies (Share Capital and Debentures) Rules, 2014	Register of Security Buyback	Form SH 10	Registered Office
7.	Section 85 of the Companies Act read with Rule 10 (4) of the Companies (Registration of Charges) Rules, 2014	Register of charges	Form no.CHG-7	Registered Office
8.	Section 88 of the Companies Act read with Rule 5 (2) and 15 (1) of the Companies (Management and Administration) Rules, 2014	Register of Members including an index of the names	Form no. MGT-1	Registrars & Transfer Agent of the Company
9.	Section 94 of the Companies Act read with Rule 5 (2) and 15 (4) of the Companies (Management and Administration) Rules, 2014	Foreign register of members	Form no. MGT-3	Registrars & Transfer Agent of the Company

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#	Section / Rules	Description of document	Format	Place of maintaining document
10.	Section 118 of the Companies Act read with Rule 25 (1)(f) of the Companies (Management and Administration) Rules, 2014	Minutes books of board meetings and general meetings	-	Registered Office or such place as Board may decide
11.	Section 170 of the Companies Act read with Rule 17 of the Companies (Appointment and Qualification of Directors) Rules, 2014	Register of Directors and Key Managerial Personnel	-	Registered Office
12.	Section 136 of the Companies Act read with Rule 3 of the Companies (Accounts) Rules, 2014	Books of Account in electronic mode		Servers accessible in India at all times
13.	Section 186 (9) of the Companies Act read with Rule 12 of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of loans, guarantee, security and acquisition made by the company	Form no. MBP-2	Registered Office of the Company and shall be kept in the custody of the Company secretary of the Company
14.	Section 187(3) of the Companies Act read with Rule 14(1) & (3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of Investments not held in its own name by the company	Form no. MBP-3	Registered Office of the Company and shall be kept in the custody of the Company secretary of the Company
15.	Section 189(1) and (3) of the Companies Act read with Rule 16(1) & (3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of contracts with related party and contracts and bodies etc. in which directors are interested	Form no. MBP-4	Registered Office of the company and shall be kept in the custody of the Company secretary of the Company
16.	Section 239 of the Companies Act read with the Companies (Compromises, Arrangements and Amalgamation) Rules, 2016	Books and papers of a company which has been amalgamated with, or whose shares have been acquired by, another company	-	Registered Office
17.	Section 288 (2) of the Income Tax Act, 1961 read with Rule 2E(6) of the Income Tax Rules, 1962	Books of account audited by an accountant, as defined in Explanation to subsection (2) of section 288	-	Registered Office

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#	Section / Rules	Description of document	Format	Place of maintaining document
18.	Press Releases	Press release shall include but shall not be limited to, any intimation given to the press regarding financial results, profits, meetings of the Board, general meetings, and overall performance of the Company	-	Registered Office

ANNEXURE II | DOCUMENTS TO BE PRESERVED FOR A SPECIFIC PERIOD

#	Section /Rules	Description of document	Minimum retention period	Reference date / Place of maintaining document
1.	Section 13A of the Payment of Wages Act 1936	Employment records (Particulars of persons employed, wages paid, deductions made from such wages etc.)	3 years after the date of last entry	-
2.	Section 33(4) of the Delhi Shops and Establishments Act 1954 read with Shops and Establishments Rules 1954	Preserve registers, records and notices (Particulars of hours worked, amount of leave taken)	1 year	Till the end of the following year
3.	Section 20 of the Maternity Benefit Act, 1961 read with Rule 14 of the Maternity Benefit Rules, 1971	Preserve the register, record, and muster rolls.	2 years Karnataka, Chennai, Delhi and Haryana 3 years for Maharashtra	From date of their preparation
4.	Clause 19.5 of the IRDAI Revised AML guideline 2023	Customer identification data obtained through the customer due diligence process, account files and business correspondence.	5 years	Date of end of business relationship
5.	Section 17(9) IRDA (Appointment of Insurance Agents) Regulations 2016	Documents pertaining to Insurance Agent (viz., Agents Application and other documents).	5 years	From the date of cancellation/ suspension of Agency relationship
6.	Clause 12 of IRDAI Guidelines on Distance Marketing of Insurance Products, 2011	Call records (entire process beginning with lead generation/solicitation and concluding in sale of insurance) – Telesales	6 months	From end of the term of policy or until satisfactory settlement of claim, whichever later
7.	Schedule VI Form T (14) IRDAI (Insurance Web Aggregators) Regulations, 2017	Call records (entire process beginning with lead generation/solicitation and concluding in sale of insurance) – Web Aggregators	6 months from reference date or 10 years, whichever is later.	From end of the term of policy or until satisfactory settlement of claim, whichever later
8.	Section 34(5) IRDAI	Books, documents,	7 years	From the end of year

DATA RETENTION AND ARCHIVAL POLICY

#	Section /Rules	Description of document	Minimum retention period	Reference date / Place of maintaining document
	(Insurance Brokers) Regulations, 2018	statements and contract notes maintained		to which they relate
9.	Clause 3.1.14 of Master Circular on Anti Money Laundering/Counter-Financing of Terrorism (AML/CFT)-Guidelines for Life Insurers	Records for Suspicious activity monitoring including all documents /office records /memorandums for recording	5 years	From date of activity monitoring
10.	Section 24(3) e-Telecom Commercial Communications Customer Preference Regulations, 2018	Records of customer complaints with details of all complaint(s) such as date, time, status of resolution	3 years	From date of registration of complaint
11.	Section 3 (iv) Insurance Regulatory and Development Authority (Insurance Advertisements and Disclosure) Regulations, 2000	Specimen of all advertisements	3 years	From date of posting the advertisement
12.	Regulations 30(8), 46, 51(3) and 87B(5) of SEBI LODR Regulations	All events or information which have been disclosed to the stock exchange	5 years	From date of disclosure of information
13.	Section 73 /76 of the Companies Act read with Rule 14 (3) of the Companies (Acceptance of Deposits) Rules, 2014	Registers of Deposits	Period of not less than 8 years from the financial year in which the latest entry is made in the register	Registered Office
14.	Section 85 of the Companies Act read with Rule 10 (4) of the Companies (Registration of Charges) Rules, 2014	The instrument creating a charge or modification	Period of 8 years from the date of satisfaction of charge by the Company	Registered Office
15.	Section 88 of the Companies Act read with Rule 5 (2) and 15 (2) of the Companies (Management and Administration) Rules, 2014	Register of debenture holders including an index of the names in Form MGT 2	Period of 8 years from the date of redemption of debentures or securities, as the case may be, and shall be kept in the custody of the Company	Registered Office of the Company /Registrars & Transfer Agent of the Company

DATA RETENTION AND ARCHIVAL POLICY

#	Section /Rules	Description of document	Minimum retention period	Reference date / Place of maintaining document
			secretary of the Company or any other person authorized by the Board for such purpose	
16.	Section 94 of the Companies Act read with Rule 5 (2) and 15 (2) of the Companies (Management and Administration) Rules, 2014	Foreign register of debenture holder in Form MGT 3	Period of 8 years from the date of redemption of debentures or securities, as the case may be, and shall be kept in the custody of the Company secretary of the Company or any other person authorized by the Board for such Purpose	Registered Office of the Company / Registrars & Transfer Agent of the company
17.	Section 94 of the Companies Act read with Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	Annual return and copies of all certificates and documents required to be annexed thereto in Form MGT 7	Period of 8years from the date of filing with the Registrar	Registered Office
18.	Section 184 of the Companies Act read with Rule 9 (3) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Disclosures/ Notices by a director of his interest	Period of 8 years from the end of the financial year to which it relates	Registered Office
19.	Section 128(5) of the Companies Act	Books of Accounts Including vouchers relevant to any entry in such books of account	8 financial years preceding current financial year	Registered Office of the Company or at such other place in India
20.	Section 94 of the Companies Act read with Rule 15 of the Companies (Management and Administration) Rules, 2014	Copies of annual return	8 years from date of filling with the Registrar	Registered office of the Company
21. s	Section 184 read with Rule 9 of the Companies (Meeting of the Board and its Powers) Rules, 2014	Disclosure of Interests in Other Entities	8 years from the end of the financial year to which it relates	Registered office of the Company

DATA RETENTION AND ARCHIVAL POLICY

#	Section /Rules	Description of document	Minimum retention period	Reference date / Place of maintaining document
22.	Section 173 and 174 of the Companies Act read with Rule 3 of the Companies (Meeting of the Board and its Powers) Rules, 2014	Draft minutes of the summary of decision taken during meeting	till the confirmation of the draft minutes	Registered office of the Company
23.	Section 44 of the Employees State Insurance Act read with Rule 32 (2), 66 and 102 of the Employees State Insurance Rules, 1950	Registers and Records, Accident Book and Inspection Book	5 years from the date of the last entry therein	-
24.	Rule 19A of the Maharashtra State Tax on Professions, Trades, Calling and Employment Rules, 1975	Preservation of books of accounts, registers etc	6 years from the expiry of the year to which they relate	-
25.	Rule 7 (3) of the Companies (Share Capital and Debentures) Rules, 2014	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	Not less than 30 years and in case of disputed cases, shall be preserved permanently	Registrars & Transfer Agent of the Company
		All certificates surrendered to a Company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters	May be destroyed after the expiry of 3 years from the date on which they are surrendered, under the authority of a resolution of the Board and in the presence of a person duly appointed by the Board in this behalf	Registrars & Transfer Agent of the Company
26.	Section 92D of the Income Tax Act, 1961 read with Rule 10D and 10DA of the Income Tax Rules, 1962	Information and documents under in relation to international transaction or specific domestic transaction	8 years from the relevant assessment year	Registered Office