

## Policy Framework for Voluntary Freezing/Blocking of **Online Trading Account Access for Clients**

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### **Bajaj Capital Markets Limited**

(Formerly known as Just Trade Securities Limited)

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#### 1. INTRODUCTION

In an effort to enhance the ease of business operations and investment activities for investors, and to safeguard investors from suspicious activities, SEBI, through its circular ref. No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024, has mandated a framework for stock exchanges. This framework requires Trading Members to provide clients with the facility to voluntarily freeze/block online access to their trading accounts. Consequently, stock exchanges have issued circulars detailing this framework. In line with these directives, the following policy has been formulated for the voluntary freezing/blocking of trading accounts.

Whenever client of JTSL notice any suspicious activities in their online trading account and/or suspect that login credential of their trading account are breached/hacked and there is an urgent need to address the situation and block/freeze the access and/or activities in their trading account, the client can choose any of the following mode of communication to intimate/send a request to JTSL for Voluntary Freezing/Blocking of their online Trading Account..

#### 2. SCOPE AND REVIEW OF POLICY

This policy shall be applicable as and when clients require to freeze / block online access to their trading account and subsequently desires to unfreeze the same.

The model of this policy consists of all employees who are directly, indirectly dealing with clients' needs to understand and follow the policy to avoid unwanted suspicious activities in client's trading account

#### 3. FRAMEWORK FOR VOLUNTARY FREEZING OF ONLINE ACCESS OF CLIENT'S TRADING ACCOUNT

#### a) **REQUEST FOR FREEZING**

- i. Client may request for voluntary freezing /blocking the online access to their trading account through two modes of communication of the following modes shall be made-
  - Email from registered mail id to **stoptrade@justtrade.in**
  - IVR by calling on this Customer Care Number: 180030009000.

# B) FOLLOWING ACTIONS ON THE RECEIPT OF REQUEST THROUGH ANY MODES OF COMMUNICATIONS AS PROVIDED BY US FOR FREEZING/BLOCKING OF THE ONLINE ACCESS OF THE TRADING ACCOUNT FROM THE CLIENT

i. Validate that the request is received from the client as per below point no. 4 and issue the acknowledgement as well as freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the said client. The timelines for freezing/blocking of the online access of the clients' trading account is as under: -

Scenario	Timelines for issuing acknowledgement as well as freezing/blocking of the online access of the
	Trading account.
Request received during the trading	Within 15 minutes
hours and within 15 minutes before	
the start of trading.	
Request received after the trading	Before the start of next trading session
hours and 15 minutes before the start	
of trading	

- ii. Post freezing/blocking the client's trading account, send a communication on the registered mobile number and registered e-mail ID of the client, stating that the online access to the trading account has been frozen/blocked and all the pending orders in the client's trading account, if any, have been cancelled along with the process for re-enablement forgetting the online access to the trading account.
- iii. Details of open positions (if any) should also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account. This will eliminate the risk of unwanted delivery settlement. This time limit shall be contracted after a review in the next six months after the date of its applicability to enhance protection of investors from suspicious activities.
- **4.** The Trading Member shall have a mechanism in place to validate that the request for freezing/blocking of the online access of the trading account is received from the respective client only. This can be done by the Trading Member by:
  - a. verifying whether request is received from the registered phone number/e-mail Id of the client; or where request is received from other than registered phone number/e-mail Id of the client, the Trading Member should have a client authentication procedure (2 Factor Authentication) in place or
  - **b.** Following any other process as may be prescribed by the Exchange(s) uniformly in consultation with SEBI, from time to time.
- 5. The Trading Member shall maintain the appropriate records/logs including, but not limited to, request received to freeze/block the online access of trading account, confirmation given for freezing/blocking of the online access of the trading account and cancellation of pending orders, if any, sent to the clients.
- 6. **Re-enabling the client for online access of the trading account**: The Trading Member shall re-enable the online access of trading account after carrying out necessary due diligence including validating the client request by mail or IVR and unfreezing/unblocking the online access of the trading account

#### 7. Further, it is clarified that:

- a) Freezing/ blocking is only for the online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of Share India Securities Limited.
- b) The request for freezing/ blocking does not constitute request for making Unique Client Code (UCC) as inactive in the Exchange records.

**Note:** In case of statutory/ regulatory amendments from time to time, the policy can be internally reviewed and updated to comply with the new amendments.