

Vardhaman Capital Pvt.Ltd.

LOG RETENTION POLICY

Policy created by	Designated Officer
Policy reviewed by	Technology Committee
Policy reviewed on	31-12-2024
Policy Approved by	Board of Directors
Policy approved on	04-01-2025

Version – 1.0

Purpose

The purpose of this Log Retention Policy is to establish guidelines and procedures for the retention, management, and secure disposal of logs at our Company. This policy aims to ensure the availability of logs for operational needs, compliance with regulations, and effective response to security incidents.

Scope

This policy applies to all employees, contractors, third-party vendors, and any other individuals who have access to or are responsible for managing logs within the stock brokerage firm.

Definitions

Logs: - Records generated by systems, applications, networks, and security devices that capture events, transactions, or interactions.

Log Retention: -The period for which logs are stored and maintained.

Policy Guidelines

Identification of Critical Logs

Critical logs, including but not limited to security event logs, system logs, and application logs, will be identified based on their significance to operations, compliance, and security.

Retention Periods

- Retention periods for logs will be determined based on regulatory requirements, legal obligations, and business needs.
- Different types of logs may have different retention periods.

Log Storage

- Logs will be stored in a secure, centralized repository with restricted access.
- Adequate measures will be taken to protect log storage facilities physically and logically.

Encryption of Stored Logs

Logs stored for an extended period will be encrypted to ensure the confidentiality and integrity of the information.

Regular Review of Logs

- Logs will be regularly reviewed to identify anomalies, security incidents, and operational issues.
- Automated tools may be used to assist in log analysis.

Disposal of Obsolete Logs

Logs that have exceeded their retention period or are no longer relevant will be securely disposed of using industry-accepted methods.

Legal Hold

In case of legal proceedings or investigations, a legal hold may be applied to prevent the disposal of relevant logs.

Monitoring and Auditing

The log retention process will be monitored, and periodic audits will be conducted to ensure compliance with this policy.

Compliance and Legal Considerations

Regulatory Compliance

- The log retention policy will comply with relevant financial regulations and industry standards.
- Regular audits will be conducted to verify compliance.

Documentation

Detailed records of log retention periods, disposal processes, and audit results will be maintained for compliance and audit purposes.

Review and Update

This policy will be reviewed regularly and updated as necessary to address changes in regulations, business processes, and emerging risks.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff / Employees /and Directors of the Company.

Vardhaman Capital Pvt.Ltd.

CISO :- Anup Kumar Khandelwal

Dated: - 04-01-2025