

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

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Policy for voluntary freezing of Client's online access**1. Background :**

SEBI vide its circular SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and Exchanges vide their circulars dated April 08, 2024 mandated trading members to provide the facility of voluntary freezing/blocking the online access of the trading account to their clients on account of suspicious activities. The said circular also requires the trading members to frame a policy in line with the framework specified by the Exchanges, which shall be the part of the trading member's Risk Management Policy.

2. Scope:

This policy shall be applicable as and when clients require freezing / blocking online access to their trading account and subsequently desire to unfreeze the same.

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 any one of the following modes that shall be made –
 - Phone – Phone call / SMS from registered mobile number
 - Email to stoptrade@apolloomoney.com from registered email address
 - Back-office Portal – Users could request freezing of their account directly by logging in to the back-office with their login credentials
- ii. Client Validation :
 - Client details would be verified and authenticated as per the data provided in their trading account.
- iii. The client shall submit request for freeze.
- iv. On receipt of such request, the client's trading account shall be frozen/locked within 15 minutes if the request is received during the trading hours or before the next trading session if the request is received after the trading hours, and simultaneously all the pending orders shall be cancelled.
- v. Post freezing/blocking the client's trading account, a communication shall be sent on the registered mobile number and registered e-mail ID of the client. The communication shall also provide the process of re-enablement of the trading account.

b. Request for Un-freezing

- i. Client may request for unfreezing / unblocking the online access to their trading account through any one of the following modes that shall be made –
 - Phone – Phone call / SMS from registered mobile number
 - Email to registration@apolloomoney.com from registered email address
- ii. Client then needs to authenticate themselves by providing their Personal details including
 - Demat account details
 - Trading ID / Login ID
 - PAN
 - Date of Birth
- iii. An email acknowledgement shall be sent to the client informing him / her of the unfreeze request and the date by which online access shall be activated.
- iv. On successful reactivation client shall be able to login to the Trading platform.

c. Important points

- i. All logs of freeze and unfreeze request and communications sent shall be maintained for audit trail.

4. Policy Review:

The said policy shall be a part of PSBL's Risk Management Policy and shall be reviewed along with the said policy from time to time.