

EPIMONEY PRIVATE LIMITED

RECORD RETENTION POLICY

Detailed Policy Document

EPIMONEY PRIVATE LIMITED

Record Retention Policy

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1. INTRODUCTION:

Regulated Entities (REs) should take appropriate steps to evolve a system for proper maintenance and Preservation of account information/document in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities. Document retention means the manner of retaining the documents of Epimoney Private Limited (hereinafter referred as “**the Company/ Company**”) and the time period up to certain documents are to be retained by the Company and the time period when such documents can be allowed to be purged.

This Record Retention Policy (“Policy”) aims at streamlining and ensuring the smooth functioning of the Company. Its core aspect is as follows:

- a) Nature and types of documents to be preserved/archived and retrieved.
- b) Duration and circumstances under which they must be preserved.
- c) Security and confidentiality of these records/documents.
- d) Mode of destruction including but not limited to electronic and physical.

2. DEFINITIONS:

- a) “**Applicable Law(s)**” means and includes any statute, law, rule, circular, guideline, regulation, ordinance, judgment, order, decree, bye-law, clearance, directive, policy, notifications, clarifications or other governmental instructions and/or mandatory standards by any Authority, as may be applicable to the Company from time to time and in which the Preservation of the Records is prescribed.
- b) “**Anonymization**” means the irreversible process of permanently stripping, encrypting, or obfuscating Personally Identifiable Information (PII) and any other identifying markers from a Record, such that the remaining Data can no longer be associated with an identified or identifiable natural person, directly or indirectly.
- c) “**Authorised Personnel**” means the Functional/ Departmental Heads and/or their respective authorized representatives.
- d) “**Authority/Authorities**” means any national, state, provincial, local or similar government, governmental, regulatory or administrative authority, branch, agency, any statutory body or commission or any non-governmental regulatory or administrative authority, body or other organization to the extent that the rules, regulations and standards, requirements, procedures or orders of such Authority, body or other organization have the force of Applicable Laws or any court, tribunal, arbitral or judicial body, or any stock exchange as applicable in the relevant jurisdiction with respect to a Party. For the avoidance of doubts, it is hereby clarified that, Reserve Bank of India, Central Government, Securities and Exchange Board of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India shall be included in the definition of Authority for the purposes of this Policy.
- e) “**Board**” means the Board of directors of the Company.
- f) “**Books of Account**” means and includes records maintained in respect of (i) all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place; (ii) all sales and purchases of goods and services by the Company; (iii) the assets and liabilities of the Company; and (iv) the items of cost as may be prescribed under Section 148 of the Companies Act, 2013 as applicable.

- g) **“Data”** means a set of information, knowledge, facts, concepts, instructions or numbers, prepared or collected in a formalised manner or information in an Electronic Form that can be stored and used by a system.
- h) **“Data Retention”** means the process of continued storage of the Company’s Data for various compliance and business requirements for a specified period. It comprises of active Data and archived Data.
- i) **“Data Purging”** or **“Disposal”** means the method of erasure or deletion of Data from the storage systems, which is no longer required. Data that has undergone Anonymization is no longer considered customer Data or PII, and is not subject to the Data Purging mandate of this Policy..
- j) **“Electronic Record(s)”** means the Electronic Record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- k) **“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.
- l) **“Records”** means any information created, received, and maintained as documentary evidence and information by the Company, in any form, in pursuance of legal obligations or in the transaction of its business, and includes but is not limited to memoranda, e-mails, appointment books, Records of customers of the Company, text files, web files, etc. papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and/or any other related Record.
- m) **“Personally Identifiable Information (PII)”** means any information that relates to an identified or identifiable natural person or a legally constituted entity and includes any Data that, either alone or in combination with other information, is capable of identifying such person or entity, directly or indirectly.
- n) **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- o) **“Transient Records”** means temporary, preliminary, or ephemeral Data and communications that are not intended to be retained as formal business evidence. This includes, but is not limited to, casual internal chat messages, preliminary drafts of documents, temporary working papers, and routine administrative calendar invites. Transient Records are explicitly excluded from the definition of "Records" under this Policy and may be deleted routinely without logging.

3. LEGAL REQUIREMENT:

This Policy has been framed keeping in view particularly the requirements of provisions of Companies Act, 2013 applicable RBI Guidelines and other Authorities (under whose gamut all the functions of the Company are subjected to). The Policy requires to provide for the systematic Data Retention and destruction of documents received or created by the Company. This Policy addresses all documents regardless of physical or Electronic Form, and this Policy helps understand how long each type of Records should be kept.

Some specific requirements under different Applicable Laws are set out below:

- a) **Income Tax Act, 1961:** Under the Income Tax Act, 1961, Books of Accounts should be maintained for at least eight years from the end of relevant assessment year. Records is required to be maintained by the Company at various levels for various purposes including and not limited to future reference, giving information to customers, submission to court or any other Authority or statute, audit and inspection.

- b) **Central Goods and Services Act, 2017:** Under the CGST Act, 2017, a registered person must maintain Books of Account and prescribed Records (invoices, input tax credit registers, output liability registers, etc.) for at least eight years from the due date of filing of the annual return for the relevant year. If the person is involved in an appeal, show-cause notice, revision, or investigation under the Act, then these Records must be maintained for one year after the final disposal of the proceedings, or for the eight-year period, whichever is longer.
- c) **Prevention of Money Laundering Act, 2002 (“PMLA”) and Prevention of Money Laundering (Maintenance of Records), Rules 2005 (“PML Rules”):** The PMLA Rules read with the Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025 as issued by the RBI specifies that the Company shall maintain, preserve and report customer account information, with reference to provisions of PMLA and its rules.

Further, the Reserve Bank of India (Non-Banking Financial Companies – Know Your Customer) Directions, 2025 as issued by the RBI and as amended/updated from time to time also specifies to preserve the Records pertaining to the identification of the customers and their addresses obtained while opening the account and during the course of business relationship, for at least five years after the business relationship is ended.

4. TYPES OF RECORDS:

Records/Data in this Policy include inter alia the types of Records as listed below and are classified according to the retention period applicable to them.

- a) User personal Data;
- b) User non-personal Data;
- c) Loan Records;
- d) User communication;
- e) Letters, statements, returns etc.;
- f) Audit reports, including internal audit reports, external audit reports, RBI audit/inspection reports, inspection of any other nature, concurrent audit reports, revenue audit reports, system audit reports and management audit reports;
- g) Applications and sanctions of credit proposals and related documents;
- h) Control and Statistical Returns;
- i) Annual Closing Returns (P/L, B/S, tax audit, external audit);
- j) Employees and staff files;
- k) Department wise / subject wise circular files;
- l) Registers: salary, attendance, bonus, PF/gratuity, pension, medical aid, special medical bills etc, staff welfare – payments made under various schemes, various business / operational registers, log books, office order register/ files;
- m) Ledgers and other accounting books etc.
- n) Technical and functional requirement documents and system code, scorecard definitions, scorecard implementation code, other key analytics outputs.
- o) Broadly, all Records/Data may be divided into: (a) Records/Data which are to be retained for a specific period of time; and (b) Records/Data which shall be preserved permanently.

5. INTERNAL RECORDS:

Internal Records include, but are not limited to: (a) all notes, policies/SOPs, reports, details of appointments, internal emails /communications, etc.; (b) preliminary Records relating to transactions; (c) internal ledgers and registers maintained by the Company (which are not required to be maintained pursuant to any Applicable Law) such as loan register, EMI/ receivable/ payable register, register of destroyed/purged Records (along with necessary evidence), and other Records that are intended to be superseded by final or permanent Records, or which are intended to be used only for a limited period of time (such as, for example, preliminary written memoranda, reports, drafts, and internal correspondence or communication regarding customers or transactions).

Once the relevant transactions or matters pertaining to any internal Records come to an end, the Authorised Personnel shall review such Records. Once they ensure that they have duplicates of all final Records, the internal Records can be retained, destroyed (if in physical form) or permanently deleted (if in Electronic Form by the Tech department after the approval from the Authorised Personnel) in terms of the Record Retention Schedule. Subsequently, the final Records (and duplicates thereof, if any) as aforesaid shall be organized by the managers and stored appropriately, as required under this Policy.

6. CUSTOMER RECORDS:

All Records provided to or received from any customers shall be retained for a period of at least five years from the date of creation of such Records or as per the Record Retention Schedule or such longer period as required under any Applicable Laws. In the event of receipt of any request (in writing) to delete any customer's Data, the Company will purge such Data (a) within 30 (thirty) days of receipt of a written request; or (b) at the end of the tenure of the active/ongoing loans/contracts with such customer; or (c) within any duration stipulated under any Applicable Laws, whichever is later. In case of rejected customers Data, the Records may be stored for a period of three years from the date of creation of such Records or as per the Record Retention Schedule or such longer period as required under any Applicable Laws.

7. TRANSACTION RECORDS:

The Company shall maintain a record of all transactions with its customers, vendors/agencies and other third parties whether attempted or executed, including information related to the transactions, for a minimum period of five years from the date of the transactions or such duration stipulated under any Applicable Laws. The Company shall preserve and maintain Records evidencing the identity of its clients and beneficial owners, if any, as well as account files and business correspondence relating to its clients for a minimum period of five years after the later of: (a) the business relationship has ended with the client; or (b) the account has been closed. The Records maintained shall be such that individual transactions can be reconstructed.

8. RECORDS UNDER THE COMPANIES ACT, 2013

The Company shall maintain all Records pertaining to the as per the Companies Act, 2013 for the periods specified under the Companies Act, 2013 depending on the type of record in question. For example, the notice, attendance register, and related documents relating to meetings of the Board shall be preserved for at least eight financial years. Register of members, minutes of all meetings are to be preserved permanently, the register of members shall be preserved permanently, etc.

9. LEGAL DOCUMENTS:

All documents of a legal nature, including but not limited to agreements, legal opinions, pleadings, orders passed by courts or tribunals, judgments, interim orders, Records relating to pending cases, etc. will be within the purview of legal documents, under this Policy.

All orders passed by any courts, tribunals, or other competent Authorities shall be retained by the Company permanently. All pleadings relating to the Company shall be retained for a period of five years from when the matter has been disposed of by the courts, tribunals, or other relevant authorities.

All agreements shall be retained for at least five years from the date of their termination or expiry. All Records relating to intellectual property owned by the Company shall be retained permanently.

Records of all licenses obtained by the Company shall be retained for at least five years from the expiry of validity of the license.

All documents relating to any properties owned by the Company shall be retained permanently. All documents relating to properties not owned by the Company shall be retained for five years after the Company ceases to have any rights or interests in such properties.

10. TAX RECORDS:

All tax Records, such as Records relating to tax assessments, tax filings, tax returns, proof of deductions, appeals preferred against any claims made by the relevant tax Authorities, and all such other Records may be maintained for a period of at least eight years from the relevant date, or from the date of final order with respect to any matter which was preferred for appeal, as applicable.

11. EMPLOYMENT RECORDS:

All Records relating to recruitment, employment and all other information relating to each employee, such as performance reviews, disciplinary actions taken with respect to the employee, details of complaints by or against any employee, shall be retained for a period of five years from the date of termination of employment with the Company.

12. PRESS RELEASES AND MARKETING DATA:

All press releases issued by the Company, which include all information provided to the media regarding the Company; and all marketing Data and Records may be retained for at least five years from the date of publication of such Records.

13. E-MAIL RECORDS:

All Records of internal communications, emails and other communication in Electronic Form, and all information stored, transmitted, received, or contained on the Company's information systems or servers are the sole property of the Company. Employees have no expectation of privacy in relation to the use of Company equipment and/or servers, and the transmission, receipt, or storage of information using the Company's equipment and/or servers. All Records communicated or stored on the Company's equipment and/or servers may be accessed by the Company at any time, without notice to or consent from the relevant employees.

Employees using the equipment and servers for personal use do so at their own risk. However, employees shall, as much as possible, avoid using the Company's equipment for personal purposes, and any personal Data shall be deleted as soon as possible.

All emails may be retained for a period of 30 (thirty) days from the deletion of the email account, unless their retention for a longer period is considered necessary by the Tech department in consultation with the relevant Authorised Personnel. All emails Records between the Company and third parties may be retained for at least five years from the date of the communication if it is material to the Company. All emails on complaints, disputes, fraud, audits, accounting, and internal controls may be retained permanently.

14. RECORD MAINTENANCE AND STORAGE:

All physical Records covered under this Policy shall be securely maintained by the relevant employee or department, as the case may be, at the respective office from which they operate, or such other location as intimated by the Company. Wherever the Records are stored/ preserved/ retained, proper and adequate measures shall be in place to prevent any incidence of any force majeure event. For this purpose, the relevant Company policies/operating manuals should be followed in its true spirit to avoid any such incidences.

All Electronic Records covered under this Policy shall be maintained on the Company's secure centralized database which shall be owned by the Tech department.

15. RECORD RETENTION SCHEDULE:

The Company establishes and modifies as necessary, from time to time, the retention policies applicable to different categories of Records, as summarized in **Annexure-I** ("Record Retention Schedule"). This is done in order to comply with Applicable Laws, and to protect the interests of the Company (to protect our interests in ongoing litigations or disputes, or to preserve our intellectual property, for example). The retention period not specified in this Policy for any other records shall be determined by the Founder(s) in consultation with relevant Authorised Personnel and as per Applicable Laws

16. DISPOSAL OF RECORDS:

The Records specified in **Annexure-I** which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Authorised Personnel. Any deviation will be approved by the Founder(s) of the Company. List of Records containing the details of purging/Disposal of Data shall be preserved permanently, along with evidence of having Purged any particular Data, which might be required to be produced at any court, Authority, auditor etc. in support or as evidence of having purged the Data.

The exercise for Purging of all Data shall be undertaken periodically, unless required to be completed earlier in terms of this Policy and any agreement, Applicable Laws, or any request made by a third party.

The Technology Department shall implement and maintain appropriate systems and controls to identify Data due for purging as per the Record Retention Schedule, automate its segregation and transition where feasible, securely purge Electronic Records (whether manually or through automated systems) including those stored on servers and cloud infrastructure, and maintain proper audit logs for all purging and anonymization activities.

All physical Records that shall be destroyed pursuant to this Policy shall be destroyed using a shredder and ensured by the Authorised Personnel. The Tech department shall enable and adopt the necessary processes to (a) put in place an automated system for identifying the Data/Records for purging/Disposal and carrying out the exercise of purging/Disposal at a pre-defined periodicity; (b) segregation and moving Data from retained status to Purging in terms of the Record Retention Schedule in respect of any other Data; and (c) Purge Electronic Records, including in physical storage media such as CD-ROMs, DVDs, backup tapes, hard drives, mobile devices, and portable drives.

17. SUSPENSION OF DESTRUCTION AND DELETION OF RECORDS:

In case of any lawsuits, disputes, or other such proceedings involving the Company (each, a "**Suspension Event**"), whether in existence or foreseen, all Records (whether physical or in Electronic Form) that are, or may be relevant to such Suspension Event shall be retained and cannot be deleted or destroyed. Employees shall recognize that they may be subjecting themselves and the Company to civil and/or criminal penalties, in case of contravention of this requirement.

The litigation department of the Company shall provide additional guidance to the relevant employees and teams of the Company in case of a Suspension Event.

18. COMPLIANCE:

The Compliance team in consultation with relevant Authorised Personnel shall administer this Policy and is in charge of implementing the necessary processes and procedures to ensure that employees of the Company comply with this Policy. Failure to comply with this Policy may result in disciplinary action, and in civil and/or criminal liability for the Company and relevant employees, as may be determined by the Company.

19. EXCEPTION:

The only exception to employees' compliance with this Policy is if the relevant employee retains Records beyond the timelines specified herein, as he/she has reason to believe, or has been informed by the Company, that the Records are relevant to an existing or possible Suspension Event.

20. RECORD LOCATION:

All Records as mentioned and falling under the scope of this Policy shall be stored in the dedicated record keeping room. All Records which are stored digitally, shall be stored on digital server. The Record location shall be situated in India.

21. REVIEW:

The Company may review or amend the Policy, through the Board and/or a designated committee, to comply with regulatory requirements or to make any necessary modifications to meet business needs. However, Policy shall be reviewed at least annually and approved by the Board.

In case, any amendments, clarifications, circulars or guidelines is issued by the regulatory body(ies)/Authority(ies) and is immediately effective, then provisions of such amendments, clarifications, circulars and the guidelines shall prevail over the existing Policy from the effective date as referred in the notification.

ANNEXURE-I

RECORD RETENTION SCHEDULE

S. NO.	RECORD TYPE	PRESERVATION PERIOD
(A) Internal Records		
1.	All notes, reports, details of appointments, internal emails /communications excluding the Transient Records	8 years from the date of creation.
2.	Internal registers and ledgers (not required to be maintained pursuant to any Applicable Laws) such as loan register, EMI/ receivable/ payable register, register of destroyed/Purged Records (along with necessary evidence) excluding the Transient Records	8 years from the date of creation.
3.	Internal policies, SOPs, memoranda, reports, and related documents	As determined by the Compliance Team in consultation with relevant Authorised Personnel.
(B) Customer Records		
4.	Customer Records (of rejected cases), including KYC Records (such as photos, video and sound recordings collected for KYC purposes); personal and demographic Data; non-personal Data; customer profile Data; financial information (such as bank statements, GST returns, credit information, etc.); device Data (such as IP address, IMEI, device ID, MAC address, application usage information, log information, etc.), employment information, asset information, business information, and other.	3 years from the date of rejection
5.	Customer Records (of approved customers who avail loan(s) from the Company), including KYC Records (such as photos, video and sound recordings collected for KYC purposes); personal and demographic Data; non-personal Data; customer profile Data; financial information (such as bank statements, GST returns, credit information, etc.); device Data (such as IP address, IMEI, device ID, MAC address, application usage information, log information, etc.), employment information, asset information, business information, and other customer related Data (along with related files and documents).	5 years from the date of full repayment/closure of last loan availed/cessation of relationship.
6.	Financial SMS information (6-digit alphanumeric source) and installed application information on the customers' devices	3 years from date of collection unless the consent is specifically revoked by the respective customer.
(C) Transaction Records		
7.	Transactions Records with its customers and clients, including account files and business correspondence.	5 years from the date of full repayment/account closure/term.
8.	Agreements executed with, and personal files of, customers, lenders and clients, along with cheques, deeds, guarantees, demand drafts, documents relating to securities or any other related documents furnished.	5 years from the date of full loan repayment/account closure/term.

(D) Records under Companies Act, 2013

9.	i. Constitution documents, minutes of the Board, committee and shareholders' meeting, Company seals, affidavit from the subscribers to the memorandum and from persons named as the first directors, register of members, books and documents relating to the issue of share certificates, including the blank forms of share certificates, the foreign registers of members, register of charges, register of investments not held in company's name (MBP-3), register of contracts/ arrangements in which directors are interested, register for destruction or Disposal of documents or register, ii. Licenses, approvals, permissions, deed of indentures, mutation certificates, IPR's certificates or any other document which the Director(s) thinks expedient to preserve	Permanent
10.	Register of debenture holders or any other security holders	8 years from allotment
11.	Books of Accounts and supporting documents	Permanent
12.	Copies of all annual returns and copies of all certificates and Documents required to be annexed thereto	8 years from date of filing with the Registrar
13.	Foreign register of debenture holders or any other security holders	8 years from the date of Redemption
14.	Disclosure of interest of directors / declarations and undertaking submitted by the Directors (proposed / existing directors)	8 years from the end of financial year to which it relates
15.	All certificates surrendered to a company	3 years from date of surrender
16.	Register of deposits	not less than 8 years from the date of last entry
17.	Instrument creating a charge or modification	8 years from date of satisfaction of charge
18.	Board meeting attendance register, Office copies of Notices, Agenda, Notes on Agenda and other related papers,	8 years
19.	Proof of sending Notice and Agenda of the Board Meeting, draft Board Minutes and its delivery, Proof of sending signed Minutes and its delivery and Proof of sending and delivery of the draft circular resolution and the necessary papers	3 years from the date of the meeting
20.	Proof of sending the Notice of the general meeting	3 years from the date of the meeting
21.	Dividend declaration, cheques or warrants returned by the Bank, after payment thereof, and the Dividend Registers	8 years
22.	Office copies of Notices, scrutiniser's report, and related papers	as long as they remain current or for 8 financial years, whichever is later

(E) Legal Documents

23.	Legal opinions obtained by the Company	Permanent
24.	Records relating to intellectual property owned by the Company, including but not limited to patents, copyrights, trademarks, word marks, service marks, logo, technology, infrastructure, technical know-how, expertise, trade secrets, designs, databases, presentation, instruction manuals, codes, deliverables and memoranda.	Permanent

25.	All orders passed by any courts, tribunals, or other competent authorities.	Permanent
26.	Record of the audit trail of consents provided/denied/withdrawn by customers, duration of retention of information, and types/categories of customers' Data that was collected (either directly from customers or any third parties).	5 years from the date of full repayment/account closure or such maximum period as mandated under law.
27.	All pleadings relating to the Company, and files relating to fraud, disputes, suits, after closure of the matter	5 years from the date the matter has been disposed
28.	Records of all licenses obtained by the Company	5 years from its expiry
29.	Agreement executed by the Company	5 years from its termination/expiry
30.	Audit or inspection reports (by any regulatory Authority or authorized third party), where all comments are rectified and no comments relating to disciplinary proceeding is pending	5 years from date of closure of inspection
31.	Complaints raised by customers, along with responses and documents furnished	5 years from the last correspondence/closure
32.	Any other statutory Records	As specified under the relevant law
(F) Tax Records		
33.	Excise returns, income tax returns, sales tax/ VAT /GST returns, documents, challans and other details/correspondence related thereto	8 years
(G) Employment Records		
35.	KYC Records of the employees, personal information, previous employment information, educational qualification, total working experience, nominee/emergency contact details, marital status and family information (including basic information of spouse, children, father and mother), ESIC/UAN numbers, bank account details, health information (i.e. Blood group and COVID vaccination status)	5 years from cessation of employment
36.	Employment registers, such as attendance register, leave register, etc.	Permanent
37.	Employment agreements, increment/bonus/ESOP grant letters, termination/suspension/resignation letters, performance reviews, disciplinary actions taken with respect to the employee, details of complaints by or against any employee.	5 years from cessation of employment
(H) Press Releases and Marketing Data		
38.	All information provided to the media regarding the Company, and all marketing Data and related Records	5 years
39.	Emails on complaints, disputes, fraud, audits, accounting, and internal controls, including any and all emails from the customers to the Company	Permanent, until otherwise determined by the Tech department in consultation with the relevant Authorised Personnel