



Utkarsh Small Finance Bank

RECORD MANAGEMENT POLICY

Version: 06.0 (March 08, 2025)

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1. INTRODUCTION & REFERENCE

- Records are evidence of business conducted by an organization. Accordingly, documents pertaining to all transactions executed/entered into as part of business/operations, together with incoming or outgoing correspondence, minutes of meetings, management approvals, returns and other relevant communications should be held on record.
- This Policy primarily includes two types of records - physical (paper) and electronic. Any reference to "a record" or "records", within this policy, refers to either physical records such as hard copy documents e.g. cheques, vouchers, etc. or electronic records such as email, systems data, web content, etc.
- This document lays down Bank's policy and operating guidelines with regard to filing, storage, archival, safety and security of records, as well as destruction of stationery, documents and other records.
- Ministry of Law and Justice (Legislative Department) and RBI has issued various guidelines on Prevention of Money Laundering in Banks vide its circulars "The Prevention of Money Laundering (Amendment) Act 2012" and RBI/2015-16/59 Ref. DBOD No. Leg.BC.21/09.07.006/2015-16 dated July 01, 2015
- As per Bankers' Books Evidence Act, 1891, The Reserve Bank of India has advised all scheduled commercial banks (excluding regional rural banks) that
 - In the event of need for production of evidence to prove entries in Bankers' Books in any legal proceedings before courts, tribunals, consumer forums, etc., they may be guided by Section 4 read with the provision of section 2 (8) of the Bankers' Books Evidence Act, 1891.
 - This would obviate the need for production of volumes of original records of the bank and would also avoid administrative and procedural inconvenience which is normally caused in the event of such records remaining in the custody of the court till completion of such proceedings.
 - Banks should, however, ensure that original documents/ records which are the subject matter of such legal proceedings are preserved at their end till the final disposal of the proceedings and thereafter the same shall be preserved till further period of not less than 08 years.
 - The advice was contained in a judgement delivered by the Special Court (Trial of Offences relating to Transactions in Securities).
- Regulation 9 of Chapter III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, requires the Bank to frame a board approved policy for preservation of documents, classifying them in at least 02 categories as follows:
 - (a) documents whose preservation shall be permanent in nature;
 - (b) documents with preservation period of not less than 08 years after completion of the relevant transactions:

Provided that the Bank may keep documents specified in the above clauses (a) and (b) in electronic mode.

- Further, Regulation 30(8) of SEBI (LODR) Regulations, 2015 requires that the Bank shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under Regulation 30 of SEBI (LODR) Regulations, 2015, and such disclosures shall be hosted on the website of the Bank for a minimum period of 05 years and thereafter as per the **archival policy** of the Bank, as disclosed on its website. In compliance to the aforesaid regulations, this Policy is framed for the purpose of systematic categorization, maintenance, retention of documents received or created in the course of business. The Policy further encompasses the manner of archival of documents which have been disclosed on the Bank's website as prescribed under Regulation 30(8).
- In terms of the Prevention of Money Laundering (Maintenance of records of the nature and value of transactions, the procedure and manner of maintaining and time for furnishing information and verification and maintenance of records of the identity of the clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 and PML Amendment Act, 2012, the Bank should introduce a system of maintaining proper record of transactions prescribed in the guidelines for **at least five years** from the date of transaction between the bank and the client, both domestic or international, which will permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of persons involved in criminal activity. Further, Banks should ensure that records pertaining to the identification of the customers and their address (e.g. copies of documents like passports, identity cards, driving licenses, PAN card, utility bills, etc.) obtained while opening the account and during the course of business relationship, are properly preserved for at least five years after the business relationship has ended, as required under the act.
- Section 6.2 of the guidelines pertaining to "Preservation of Records" in the RBI's Master Circular on KYC & AML stipulates - Banks needs to take appropriate steps to evolve a system for proper maintenance and preservation of account information in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities. Banks should maintain records of the identity of their clients, and records in respect of transactions referred to in Rule 3 of PML Rules in hard or soft format.

2. SCOPE

This policy defines the Bank's responsibilities and provides operating guidelines for preservation of records of the Bank.

3. DEFINITIONS

- "Applicable Law" means any law, statutory rules & regulations, or standards applicable on the Bank under which any guideline / provision with regard to the preservation of the Documents has been prescribed.
- "Board" means the Board of Directors of the Bank.
- "Bank" means Utkarsh Small Finance Bank Ltd.
- "**Documents**" means all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

- “Maintenance” means keeping documents, either physically or in electronic form.
- “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.
- “Regulations” implies the following regulations -
 - (a) The Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
 - (b) Prevention of Money Laundering (Maintenance of records of the nature and value of transactions, the procedure and manner of maintaining and time for furnishing information and verification and maintenance of records of the identity of the clients of the Banking Companies, Financial Institutions and Intermediaries) Rules, 2005 and PML Amendment Act, 2012
 - (c) Bankers' Books Evidence Act, 1891, as amended from time to time
 - (d) RBI's Master Circular on KYC & AML
 - (e) The Banking Companies (Period of Preservation of Records) Rules, 1985, as amended from time to time.

4. POLICY ON PRESERVATION

4.1 Classification based on preservation period

- Based on preservation duration, the Bank shall classify the documents to be retained and preserved as follows: -
 - a) Documents whose preservation shall be permanent in nature.
 - b) Documents with preservation period of not less than eight years after completion of the relevant transactions.
 - c) Documents with preservation period department wise may have specified periodicity depending on the regulator and utility / need for the record.
- Provided that the Bank may keep documents specified in above clauses in electronic mode.

4.2 Responsibility for preservation of Documents

- All the employees in the rolls of the Bank are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.
- The principle responsibility of ensuring the preservation and archival of documents pertaining to the different departments will rest with the concerned Head of Departments / Units.

4.3 Modes of preservation

- The Documents may be preserved in

- a) Physical form and/or
- b) Digital / Electronic Form

a) **Physical form documents** can be stored Onsite and Off-site.

- **Onsite Documentation:** Documents which are required on a daily basis by the branches / head office and those mandatory to be retained in the branches / head office.
- **Off-site Documentation:** All the document's which are sent to the vendors for storing and record keeping as per the timelines.

b) **Digital / Electronic Form** can be stored Off-site. It is mandatory that all information, data, records, whether paper or electronic, relating to the payment system application (physical cheques including the images of the cheques under cheque truncation system) shall be preserved for ten years as per RBI guidelines.

1) Retention of electronic records as per section 7 of Information Technology Act 2000:

- i Where any law provides that documents, records or information shall be retained for any specific period, then, that requirement shall be deemed to have been satisfied if such documents, records or information are retained in the electronic form, if—
 - the information contained therein remains accessible so as to be usable for a subsequent reference
 - the electronic record is retained in the format in which it was originally generated, sent or received or in a format which can be demonstrated to represent accurately the information originally generated, sent or received
 - the details which will facilitate the identification of the origin, destination, date and time of despatch or receipt of such electronic record are available in the electronic record: provided that this clause does not apply to any information which is automatically generated solely for the purpose of enabling an electronic record to be despatched or received
- ii Nothing in this section shall apply to any law that expressly provides for the retention of documents, records or information in the form of electronic records

- 2) Retention of electronic records as per section 67C of Information Technology Act 2000: Preservation and retention of information by intermediaries-
 - i Intermediary shall preserve and retain such information as may be specified for such duration and in such manner and format as the Central Government may prescribe.
 - ii any intermediary who intentionally or knowingly contravenes the provisions of sub-section 2).i shall be punished with an imprisonment for a term which may extend to three years and also be liable to fine.
- 3) In respect of records relating to any pending litigation before any forum, any internal enquiry by Inspection Department, IRD, Vigilance, any investigation by CBI, Enforcement Directorate, IT Department, Investigation under FERA/FEMA/PMLA etc. are to be preserved irrespective of the periodicity of preservation and may be eliminated only after investigation/ litigation is completed and only after obtaining the prior written permission from competent authority.
- 4) Retention of electronic records has primary bearing on Back-up Strategy, Back-up Media Selection Strategy, Media Labelling Strategy, Media Testing Strategy, Off-site Storage Strategy, Receipt of Off-site Back-ups, Recycling of Storage Media, Disposal of Electronic Media, etc. This is an IT Operational requirement for regulatory and legal compliances.
- 5) For electronic records maintenance part, inputs shall be taken from IT as the ownership for storing, managing and retrieving (backup/ restoration) electronic records comes under the jurisdiction of IT. Classification based on criticality shall be decided with inputs from business owners/ departments. Inputs on regulatory guidance if any, in addition to the above may be obtained from compliance department.
- 6) **Off-site Documentation:** All the document's which are stored on clouds, external hard disk and other Digital / Electronic methods.

4.4 Authority to make alterations to the Policy

Head Operations along with Chief Compliance Officer and Chief Risk Officer is authorized to make such alterations to this Policy as considered appropriate, subject to the condition that such alterations shall be in consonance with the provisions of the Regulation and other applicable laws.

4.5 Destruction of Documents

- After the completion of retention period, concerned Branch / Unit head shall decide the records which are to be destroyed as per extent guidelines, in presence of minimum two Employees. A list of the Documents destroyed shall also be maintained and the same should be informed to Zonal Head / Department head on a Quarterly basis. It shall state the brief particulars of the Documents destroyed, date of destruction etc.

4.6 Conversion of the form in which the Documents are preserved

The physical Documents that are preserved may also be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

4.7 Archival Policy

The Bank is having in place a Board approved “Preservation of Documents and Archival Policy” which outline the framework on Bank’s responsibilities and provides operating guidelines for preservation of documents and records of the Bank and the process of archiving the events/information which had been disclosed on the website of the Bank after disclosing them to the stock exchanges.

5. ENGAGEMENT OF OUTSOURCING FOR SAFEKEEPING OF OLD RECORDS

- a. The Outsourcing Policy' of the Bank, drawn up on the basis of RBI guidelines, covers only outsourcing of financial services to third parties. For outsourcing of safekeeping of documents, it is proposed as under:
 - Necessary approval should be obtained from respective Competent Authority.
 - Due diligence of the service provider should be carried out by the respective teams before engaging the service provider.
 - Half yearly review of the service provider should be undertaken by the Zonal Office along with other outsourcing activities to ascertain the continued capability of the service provider on various predefined parameters.
 - The half-yearly review report on safekeeping of old records should be submitted to respective business team after routing it through the Outsourcing Committee.
- b. Due to variety of reasons, the need to engage the services of a professional agency for safe keeping the old record is being increasingly felt at even smaller centres. At many of these centres, the services of all national level vendors may not be available and Bank may have to look up to the regional / -local vendors. If need to be vendors may be approved by the Head Office based on the financial / technical parameters.
- c. Some of these are enumerated for ready reference:
 - It should be a reputed, experienced corporate entity with profitable track record of at least two years / financial soundness.
 - The warehouse should be preferably owned by the vendor and where the premises are on lease, the lease agreement should have a provision for extension of lease.
 - Location of the warehouse should not be in flood / riot prone area.
 - Warehouse must have adequate security arrangements e.g. firefighting equipment, CCTV, guards, etc.
 - The records should be insured against fire, theft, etc.

- It should have adequate measures in place to control dampness, rodent and pest control.
 - Electrical fittings are not prone to short circuits and whether during the nonworking hours, the electrical supply to the warehouse can be stopped.
 - Business continuity and Management of Disaster Recovery Plan.
 - Robust internal controls to ensure that the record is not misplaced / lost and can be retrieved within the desired timelines and infrastructure is in place.
- d. As the service of the vendor comes at a cost, the owner of the record must ensure that the old record is destroyed from time to time in terms of the timelines specified herein so as to reduce cost after taking approval from Head Office / Department Head.
- e. Where the record is maintained by an outsourced agency. The ZO or the concerned CO department must depute an Officer to inspect the premises where the records are kept to see whether all records, books and vouchers etc. are properly maintained and preserved and service provider has taken all necessary precautions to preserve the record.
- f. **Inspection by Branch Head:** To ensure proper maintenance of record, each branch must designate an officer for the purpose and entrust him / her, the responsibility of ensuring compliance with guidelines. Additionally, Branch Head / Branch Operation Manager should periodically (at least once in every six months) examine all old records, books and vouchers to see that they are properly maintained and preserved and books labeled and placed neatly in order, and that none has been damaged by rats or insects or affected by dampness or in any other way.

6. PERIODICITY OF PRESERVATION OF DOCUMENTS

- The records preservation of documents will be broadly in line with the Statutory and Regulatory guidelines. Various department wise and periodicity wise documents are listed here in below:
- All documents introduced or to be included hereafter by the bank will be listed by the respective Department Head and forwarded to Head Operations to be attached to this policy. The document so received will be included in the next annual review.

6.1. Documents / Records to be preserved by Respective Departments

S.No.	Record Type	Retention Period
1	Account Closure Cum Deliverables Destroyed Register	Permanent
2	ATM Reconciliation Report Register	Permanent
3	Branch Document Register including all agreements, SLA's, MOU etc.	Permanent
4	Branch Inward Mail Register	Permanent
5	Branch Outward Mail Register	Permanent
6	Branch Office Order Register	Permanent
7	Branch Visit Report	Permanent
8	Cash In Transit Register	Permanent
9	Cash Transaction 10Lac and Above Register	Permanent

10	CERSAI Register	Permanent
11	Cheque Book Register	Permanent
12	Complaint Book	Permanent
13	Counterfeit Note Register	Permanent
14	Customers collection receipt	Permanent
15	Contracts and Agreements copy with customers, vendors, business associates, etc.	Permanent
16	Outward Clearing Cheques	Permanent
17	Demand Draft / Po Issue Register	Permanent
18	Counter Stock Dd/Mck Register	Permanent
19	Duplicate FD Advice Issuance Register	Permanent
20	Mortgage Registers	Permanent
21	Genset Log Register	Permanent
22	IP Cheque Tracking Register	Permanent
23	Job Allocation and Rotation Register	Permanent
24	Key Movement Register	Permanent
25	Locker Master Key Movement	Permanent
26	Locker Wait List Register	Permanent
27	Loans files	Permanent
28	Main Cash & Vault Register (Vault Register & Bait Currency Register)	Permanent
29	Other Bank Cheque Book Register	Permanent
30	Cheque Return Register	Permanent
31	Cheque Return Register- Cheque Return to Utkarsh SFB by other Bank	Permanent
32	Petty Cash Balancing Register / Branch Advance Register	Permanent
33	Pre-Generated Kits (PGK) Issuance & Stock Register	Permanent
34	Safe Deposit Locker Issue Cum Access Register	Permanent
35	Security Item Bulk Stock Register	Permanent
36	Sensitive Stationery Register	Permanent
37	Stamp Paper Register / Revenue Stamps	Permanent
38	TDR Issue Register	Permanent
39	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register	Permanent
40	Authorization / licenses obtained from any statutory authority	Permanent
41	All records/registers/vouchers which are under investigation.	Permanent
42	All Personal Ledgers	At least 8 years immediately preceding the current financial year
43	Loans and Advances Registers and Ledgers	At least 8 years immediately preceding the current financial year
44	Call, Short, Or Fixed Deposit Registers or Ledgers	At least 8 years immediately preceding the current financial year
45	Demand Loan Liability Registers	At least 8 years immediately preceding the current financial year

46	Draft Payable Registers	At least 8 years immediately preceding the current financial year
47	Paid Cheques	At least 8 years immediately preceding the current financial year
48	Paying in slips	At least 8 years immediately preceding the current financial year
49	Vouchers relating to DDs, TTs (Telegraphic Transfers), MTs (Mail Transfers), Fixed Deposits, Call Deposits, Cash Credits and other deposit and loan accounts including vouchers relating to payment to nominees	At least 8 years immediately preceding the current financial year
50	Account opening forms, inventories prepared in respect of articles in safe custody and safety lockers and nomination forms	At least 8 years immediately preceding the current financial year
51	Standing Instructions requests regarding Current Accounts	At least 8 years immediately preceding the current financial year
52	Application for TTs, DDs, MTs and other Remittances	At least 8 years immediately preceding the current financial year
53	Application for Overdrafts, Loans and Advances	At least 8 years immediately preceding the current financial year
54	FD Interest Registers	At least 8 years immediately preceding the current financial year
55	Draft TT and Mail Transfer Registers	At least 8 years immediately preceding the current financial year
56	Remittance Registers	At least 8 years immediately preceding the current financial year
57	Bills Registers	At least 8 years immediately preceding the current financial year
58	Clearing Registers	At least 8 years immediately preceding the current financial year
59	Demand Loan Liability Registers	At least 8 years immediately preceding the current financial year
60	Draft and Mail Transfer Advice Dispatched Registers	At least 8 years immediately preceding the current financial year
61	Draft and Mail Transfer Advice Received Registers	At least 8 years immediately preceding the current financial year
62	Drawing Power Registers	At least 8 years immediately preceding the current financial year
63	Stock Registers of Goods Pledged	At least 8 years immediately preceding the current financial year
64	Stock and Share Registers	At least 8 years immediately preceding the current financial year
65	Government Securities Registers or Ledgers	At least 8 years immediately preceding the current financial year
66	Registers showing Collection of Dividends and Interest on Securities on behalf of Constituents.	At least 8 years immediately preceding the current financial year
67	Registers or Ledgers of Bank's own Investments	At least 8 years immediately preceding the current financial year
68	Branch Ledgers	At least 8 years immediately preceding the current financial year

69	Overdrafts and Loan Registers	At least 8 years immediately preceding the current financial year
70	Safe Custody Registers	At least 8 years immediately preceding the current financial year
71	Equitable Mortgage Registers	At least 8 years immediately preceding the current financial year
72	Trust Registers	At least 8 years immediately preceding the current financial year
73	Clean Cash Books	At least 8 years immediately preceding the current financial year
74	Bank Cash Scrolls	At least 8 years immediately preceding the current financial year
75	Bank Transfer Scrolls	At least 8 years immediately preceding the current financial year
76	Remittance Schedules	At least 8 years immediately preceding the current financial year
77	Press-copy books	At least 8 years immediately preceding the current financial year

6.2. Management of records by MSME, MB & HL Department

S.No.	Record Type	Retention Period
1	Loan Documents and agreement & all other Documents related to loan Disbursement	To be preserved for a period upto 10 years after the business relationship between a client and the reporting entity has ended or the account has been closed, whichever is later.
2	Rejected forms and documents	
3	Registers (Required Archival on annual basis)	
4	Collection Receipt Book	

Note: Customers security documents and agreement would be as per the policy documented for the same separately.

6.3. Management of records by Treasury Department

S.No.	Record Type	Retention Period
1	G-sec Register- (are maintained in the system)	Documents to be preserved for not less than 10 years immediately preceding the current financial year
2	Call Money Register- (are maintained in the system)	
3	Deal Tickets- (are maintained in the system)	
4	Deal Confirmations -(from system)	
5	Reconciliation records- (CSGL Recon	

6.4. Management of records by Audit Department

S.No.	Record Type	Retention Period
1	All Audit Reports including compliance report from branches	Records to be preserved permanently
2	Closure and intimation of Audit Reports	
3	All Audit / inspection etc. reports submitted by any regulator	

6.5. Management of records by Administration Department

S.No.	Record Type	Retention Period
1	Copies of SLAs and NDAs with various vendors such as security agency, housekeeping agency etc.	Documents to be preserved for not less than 8 years immediately preceding the current financial year.
2	Branch visit / MIS reports in connection with Statutory Compliance of branches / other offices	
3	Financial approvals for various types of Procurement such as stationery (Secured & Unsecured), Office equipment, etc.	
4	Purchase orders of Stationery Procured.	

6.6. Management of records by Bank Secretarial Department

S.No.	Record Type	Retention Period
1	Certificate of Incorporation	Permanent
2	Memorandum and Articles of Association	Permanent
3	Agreements made by the Bank with Stock Exchanges, Depositories, etc.	Permanent
4	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013	Permanent
5	Register and Index of Members, debenture-holders, if any or other security holders, if any	Permanent
6	Register of Contracts as per Companies Act, 2013	Permanent
7	Register of Charges as per Companies Act 2013	Permanent
8	Register of investment's as per Companies Act, 2013	Permanent

9	Board documents, Management committee records, minutes of board committee meeting	Permanent
10	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013	Eight Years
11	Annual Returns as per Companies Act, 2013	Eight Years
12	Register of Deposits as per Companies Act, 2013	Eight Years
13	Register of Allotment (from the date of each allotment) as per Companies Act, 2013	Eight Years
14	Annual financial statements	Eight Years
	i. Annual accounts	
	ii. Director's report	
	iii. Auditors report	
15	All notices in form MBP - 1 received from Directors and KMPs along with any amendment thereto	Eight Years
16	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013	Eight Years
17	Copy of newspaper advertisement or publications	Eight Years
18	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means	Eight Years
19	Disclosure/Return filled under SEBI (Listing Obligation and Disclosure Requirements Regulations, 2015	Eight Years
20	All information disclosed to Stock Exchanges/ SEBI/Depositories	To be displayed on the website for a period of five years and backup data to be retained for 3 years

6.7. Management of records by Compliance Department

S.No.	Record Type	Retention Period
1	Policies of the Bank framed under various regulations	Permanent
2	Register of disposal of records	Permanent
3	Such other records as may be required under any law from time to time.	Permanent
4	All Board approved policies.	Permanent
5	All rules, regulations, circulars, Guidelines, notifications.	Permanent
6	Compliance Reports received from any statutory authority	Eight years
7	All KYC Information/ Identity & address of the customer/ Data of Customer including Beneficial Owner	Five Years
8	Normal transaction vouchers/records of transaction	Five Years
9	All Suspicious transactions, regulatory reports & due diligence conducted accounts	Five Years
10	Ongoing investigations/ transactions -subject to STR reporting	Till it is confirmed that case is closed

6.8. Management of records by Liabilities department

S.No.	Record Type	Retention Period
1	Inventory/Bulk Stock Register	Not less than 5 years immediately preceding the current financial year
2	Value of Mutilated Note Register	Not less than 5 years immediately preceding the current financial year
3	Counter Stock Register	Not less than 5 years immediately preceding the current financial year
4	Counter Stock Issuance Register	Not less than 5 years immediately preceding the current financial year
5	Correspondence relating to unreconciled entries in inter office accounts.	Not less than 5 years immediately preceding the current financial year
6	Correspondence on stationery.	Not less than 5 years immediately preceding the current financial year
7	Correspondence relating to all types of computers, accounting machines.	Not less than 5 years immediately preceding the current financial year
8	Correspondence relating to furniture and fixtures, electrical installations.	Not less than 5 years immediately preceding the current financial year
9	CCTV Daily Monitoring Register	Not less than 5 years immediately preceding the current financial year
10	Files relating to Audit & inspection	Not less than 5 years immediately preceding the current financial year
11	Files relating to staff matters	Not less than 5 years immediately preceding the current financial year
12	Hand delivery books	Not less than 5 years immediately preceding the current financial year
13	Visitor Register	Not less than 5 years immediately preceding the current financial year
14	Fixed Asset Register	Not less than 5 years immediately preceding the current financial year
15	Petty Cash Register	Not less than 5 years immediately preceding the current financial year
16	Specimen Signature Register	Not less than 5 years immediately preceding the current financial year
17	System Down time Register	Not less than 5 years immediately preceding the current financial year
18	Security Items Destruction Register	Not less than 5 years immediately preceding the current financial year
19	Death Claim Settlement Register	Not less than 5 years immediately preceding the current financial year
20	Register of Garnishee Order/Statuary Notices	Not less than 5 years immediately preceding the current financial year
21	Cheque Collected from Drop Box	Not less than 5 years immediately preceding the current financial year
22	Cash Pay in Slips	Not less than 5 years immediately preceding the current financial year
23	Cash Withdrawal Slips Register	Not less than 5 years immediately preceding the current financial year

24	Payment of Cash Through Withdrawal Slip	Not less than 5 years immediately preceding the current financial year
25	Register for Transactions Received Through Fax Email Other Than Cheque	Not less than 5 years immediately preceding the current financial year
26	Customer Requests Forms (After Closure)	Not less than 5 years immediately preceding the current financial year
27	Account Opening Forms (After Closure)	Not less than 5 years immediately preceding the current financial year
28	KYC Documents	Not less than 5 years immediately preceding the current financial year
29	Any other Customer Requests	Not less than 5 years immediately preceding the current financial year
30	Daily Reports/ Fortnightly/ Monthly Reports	Not less than 5 years immediately preceding the current financial year
31	Key Movement Register.	Not less than 10 years immediately preceding the current financial year
32	Physical Cheques (for cash withdrawal, clearing, fund transfer, RTGS/NEFT, DD etc.)	Not less than 10 years immediately preceding the current financial year
33	Cash Withdrawal Slips	Not less than 10 years immediately preceding the current financial year
34	Circulars and circular letters.	Not less than 10 years immediately preceding the current financial year
35	Confidential reports and disciplinary cases of staff.	Not less than 10 years immediately preceding the current financial year
36	Correspondence with CO and ZO, External correspondence with Government and Statutory bodies.	Not less than 10 years immediately preceding the current financial year
37	General Correspondence files.	Not less than 10 years immediately preceding the current financial year
38	Letters of Administration, Succession Certificates, Power of Attorney etc.	Not less than 10 years immediately preceding the current financial year
39	Documents relating to closed safe deposit lockers.	Not less than 10 years immediately preceding the current financial year

6.9. Management of records by Finance & Accounts Department

S.No.	Record Type	Retention Period
1	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013	Eight Years
2	Income Tax Returns filed under Income Tax Act, 1961	Eight Years

6.10. Management of records by Projects Department

S.No.	Record Type	Retention Period
1	Premises offer Templates (POT)	Permanent
2	Legal opinion Report along with property Documents (Copy if any)	Permanent

3	Legal and Registered documents	Permanent
4	Non-disclosure contracts with Vendors	Permanent
5	Service Level Agreements with Vendors	Permanent
6	Rate Contracts	Permanent
7	Renewal Lease and Addendum to the agreements	Permanent
8	Letter and Acknowledgement copies from parties	Permanent
9	Bank Guarantee (if any)	Permanent
10	Security cheque (if any)	Permanent
11	All types of budget approvals	Permanent

6.11 Management of records by Information Technology (IT) Department

Digital data backup for critical systems/applications i.e. CBS, LMS, Treasury, etc. shall be maintained in external media storage e.g tape. Tape or Media backup is a copy of computer data taken and stored so that it may be used to restore after a data loss. IT team shall ensure that back-ups are stored in a secured off-site environment in form of tapes or media storage format. The back-up will include copy of database and application.

As a bank is owner of the data, extraction of the data can be done through respective Database Management System (DBMS). In case of application backup restoration & subsequent usage shall be dependent on arrangement / agreement with respective Application Vendor as per Intellectual Property Right (IPR).

- A. Application Data: This is Business-related Customer & Transaction Data. This includes Business Data & Insights related to Customer and Transaction such as:
 - a. Digital and digitized Data or insights pertaining to customer like personal details (Name, DOB, address, Mobile Number, Email IDs, any PII data.)
 - b. Data related to Customer's Account (Product, Term, Rate of Interest, etc.)
 - c. Financial or non-financial or both data/details of transactions such as debits / credits in those accounts
 - d. Transaction Audit trails / exception history with user id or access details etc. as available in application log.
 These details are stored within database.
- B. Electronic Mail (E-mail): This is emailing data of Bank to whom Bank has issued email IDs. These mainly used for internal and external communication on these IDs. Electronic mail systems are not designed as recordkeeping system, it is normally maintained as a communication trails.
- C. System Logs: It consists of chronological record of events like login, file access, other various activities to indicate what action was attempted, who performed the action, when it was performed and if it was successful or unsuccessful. It also includes activities such as updates and patching to determine when a system component fails or incorrectly configured e.g. Logs related to Operating System, Database, Applications, Middleware, Virtual Machine, Server, Network Devices Tools etc. These are normally not stored within databases but stored at server folders in different formats. The housekeeping of these details is important task to ensure system performance. Banks managed these logs in Security Information and Event Management (SIEM) tool.

D. Third Party Service (Communication) logs: The Bank has arrangement with third service provider to deliver customer communication in form message (SMS) & email. These SMS & emails are managed & maintained at services provider end. The actual financial & non-financial transactions of customer are maintained in Application Data.

Based on Email, System Logs and Third-Party Service logs, we cannot reconstruct individual customer transactions, but these logs will help organization to monitor, analyse and review system issues Application data which is stored in tables of respective application database will be used of reconstruction of individual details of customer once database is restored.

S.No.	Record Type	Retention Period
1	Application Data	
1.1	Digital Data Backup on Storage Media like CD/ tapes, etc.	Minimum 10 Years
2	Electronic Email	
2.1	Email Communication Maintenance	Minimum 10 Years
3	System Logs (Managed within SIEM Tool)	
3.1	PIM Logs (Managed within SIEM Tool)	Minimum 1 Year
3.2	DAM Logs (Managed within SIEM Tool)	Minimum 1 Year
3.3	Sys Logs (Managed within SIEM Tool)	Minimum 1 Year
3.4	IPS / IDS Logs (Managed within SIEM Tool)	Minimum 1 Year
3.5	Firewall (Managed within SIEM Tool)	Minimum 1 Year
3.6	Application server Logs (Manage within SIEM tool)	Minimum 1 Year
4	Third Party Service Communication Logs	
4.1	SMS / Messages Logs OTP for Transaction Debit Confirmation Credit Confirmation All other SMS which are being communicated basis Regulatory guidelines: Related to Liabilities such as - - Representation of cheques, - Intimation of charges for AQB if not maintained, - Prior intimation of Inoperative A/c, - Confirmation on creation of FD, - SOC related information etc. Related to Assets such as - - Payment of EMI - Reminder of EMI Restructuring of Loans etc.	3 years
4.2	Communication email logs OTP for Transaction Debit Confirmation Credit Confirmation All other SMS which are being communicated basis Regulatory guidelines: Related to Liabilities such as - - Representation of cheques, - Intimation of charges for AQB if not maintained, - Prior intimation of Inoperative A/c,	3 years

<ul style="list-style-type: none"> - Confirmation on creation of FD, - SOC related information etc. <p>Related to Assets such as -</p> <ul style="list-style-type: none"> - Payment of EMI - Reminder of EMI <p>Restructuring of Loans etc.</p> <p>Customers' emails related to (whether to receive at CRM or Outlook)</p> <ul style="list-style-type: none"> - Complaints - SR <p>Enquiries</p>	
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6.12. Management of records by Risk Department

S.No.	Record Type	Retention Period
1	Policies related to the Risk Management Department	10 years
2	Minutes of the Meetings of ORMC, CRMC, ALCO, ISSC and Fraud Review Council.	10 years
3	Service Level Agreements entered into with the vendors / service providers	10 years
4	Operational Risk Loss Database	10 years
5	Key Risk Indicators data	10 years
6	RCSA Reports	10 years
7	Rating documents under Wholesale lending	10 years
8	RMC Agenda Note	10 years
9	CRMC Agenda Note	10 years
10	ATR of the Various Meeting	10 years
11	Daily & Monthly LCR	10 years
12	Monthly ALCO related documents	10 years
13	RBS data.	10 years
14	Approved process note for RCU activity & Transaction monitoring activity	10 years
15	Monthly CFR certificate furnished to RBI	10 years
16	ORMC Agenda Note	10 years
17	ISSC Agenda Note	10 years
18	Any Agenda Note of the Risk department meetings	10 years

6.13. Management of records by HR Department

S.No.	Record Type	Retention Period
1	Personnel Files of individual employees	Permanent
2	Attendance records, application forms, job or promotion records, performance evaluations, terminations papers, test results, trainings and qualification records, enquiry related papers	Permanent

3	Employment Contracts - Individual	Permanent
4	Correspondence with Employment Agencies and Advertisements for job openings	Permanent
5	Employee Handbook, HR Manual & Induction Manual	Permanent
6	Research and Publications and Survey reports	Permanent
7	Statutory Compliance Records (ESIC, EPF, Gratuity etc)	Permanent
8	Leave records, Payroll Register	Permanent
9	Commission / Bonuses/ Incentives/ Awards, Employee Earnings Records, Payroll Deductions, Unclaimed Wage Records	Permanent
10	Loan Documents (Housing, Mobile, bike, Education etc)	Permanent
11	Resume and Documents of candidates rejected in selection process of job Insurance claim pay out and Reimbursement related bills, vouchers and documents.	6 months
12	Employee medical Records, Health and term insurance related data and records	8 years immediately preceding the current financial year

6.14. Format for sending and retrieving Documents/Records from Record Management Agency

- Below are the formats of sending & retrieving Documents/Records from Record Management Agency

Annexure 1 “Format for sending documents/ records to Record Management Agency”

Sl	Name of the Record /Document	File Number (if Applicable)	Department	EIN applicable If	Date of Sending Document	Name and EIN of person sending the document

Annexure 2 “Format for retrieving documents/ records from Record Management Agency”

Sl	Name of the Record /Document	File Number (if Applicable)	Department	EIN applicable If	Date of Sending Request	Proposed date of receiving Document/record

Annexure 3 "Format for maintaining data for depositing and retrieving files/ records/ documents from Record Management Agency"

S l	Name of the Record /Document	File Number (if Applicable	Department	EIN If applicable	Date of Sending Request	Date of receiving Document / record	Date of resubmitting Document /record	Name of person submitting the document