Aldan Investments Private Limited
701 Heritage Plaza, JP Road
Andheri West, Mumbai 400053
CIN: U67120MH1995PTC084811

Inactive Account Policy

1. Introduction

This policy is designed to regulate and manage the trading accounts of clients that have been classified as inactive or dormant. In line with SEBI guidelines and best industry practices, Aldan Investments Private Limited ("the Company") aims to ensure proper monitoring, maintenance, and reactivation of such accounts while protecting the interests of clients.

2. Definition of an Inactive/Dormant Account

An account shall be classified as inactive or dormant if:

- There has been no financial or securities-related transaction (buy/sell, fund transfer, etc.) by the client for a period of 12 months.
- A client account may also be classified as dormant based on regulatory directives or specific risk-based considerations by the Company.

3. Identification and Notification

Quarterly Monitoring: The Company shall review all client accounts quarterly to identify those accounts that meet the criteria for inactivity.
Client Communication: Clients whose accounts have been marked as inactive will be notified by email and/or SMS, reminding them of the account's status and offering guidance for reactivation.

4. Treatment of Inactive Accounts

Restricted Activity: Once an account is classified as inactive, it will be restricted from carrying out any transactions, including buying or selling securities, until reactivation is completed.
Maintenance: Inactive accounts will continue to be subject to charges for account maintenance, custodial services, and other applicable fees as outlined in the Company's fee schedule.
Dormant Account Marking: The status of the inactive account will be appropriately marked in the Company’s internal records and systems.

5. Reactivation Process

Clients wishing to reactivate their accounts can do so by following the steps below:

- KYC Updation: Clients must ensure that their KYC details are updated as per the current regulatory norms.
- Submission of Request: A written request (online/offline) for reactivation of the account must be submitted, along with any documents as may be required (address proof, PAN copy, etc.).
- Verification: The Company may undertake a re-verification process (email, phone, or physical) to confirm the client's identity before reactivating the account.
- Approval: Upon successful verification, the account will be activated, and the client will be notified. The client can then resume trading activities.

6. Security Measures

For the safety of dormant accounts:

- Enhanced Monitoring: Inactive accounts may be subject to enhanced monitoring to detect any suspicious activity.
- Login Restrictions: Clients will not be able to log in or trade through inactive accounts without following the reactivation procedure.
- Preventing Unauthorized Use: Stringent authentication processes will be applied during the reactivation process to prevent unauthorized access to dormant accounts.

7. Closure of Dormant Accounts

If a dormant account remains inactive for an extended period (e.g., 5 years), the Company reserves the right to:

- Contact the Client: Attempt to reach out to the client to confirm their intent to continue the relationship.
- Close the Account: If no response is received and the account remains dormant, the account may be closed after a final notice to the client, and any securities or funds will be transferred to the client's registered bank account.

8. Compliance with SEBI and Other Regulations

The Company ensures that this policy complies with SEBI guidelines and other applicable laws or circulars regarding inactive accounts.
The policy may be updated from time to time to reflect changes in regulatory requirements or internal procedures.

9. Grievance Redressal

Clients with queries or grievances regarding the inactive account policy or reactivation process can contact the Company's Compliance Officer via the following channels:
Email: info@aldaninvestments.com
Phone: +912266707823

10. Policy Review

This policy will be reviewed periodically, at least once a year, to ensure it remains up to date with SEBI guidelines and evolving market practices.