

ESTELLE SECURITIES PRIVATE LIMITED

(SEBI Registered Market Intermediary for Stock Broking and Depository Operations)

SEBI Regn. No.: INZ000297338 (TM) & IN-DP-622-2021 (DP)

Member: National Stock Exchange and NCL

Bombay Stock Exchange

Central Depository Services (India) Limited



Policy on Voluntary Freezing/Blocking of Online Trading Account Access

1. Objective

This policy aims to provide clients with a facility to voluntarily freeze/block online access to their trading accounts in cases of suspicious activity. The framework aligns with SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 and NSE Circular Ref. No. NSE/INSP/61529.

2. Modes of Communication for Freezing/Blocking Requests

Clients can request to freeze/block their trading accounts using any of the following communication modes:

- **Email:** Requests must be sent from the client's registered email ID to estellegroup@hotmail.com / architrustagi12@gmail.com
- **SMS:** Requests must be sent from the client's registered mobile number to +91-9874548783
- **IVR/Tele-calling:** Call 033-40070642/033-79629631
- **Other Legally Verifiable Mechanisms:** Details will be provided on request.

3. Process for Freezing/Blocking

Upon receiving a valid request:

- Validate the request through:
 - Verification of registered email ID or mobile number.
 - Two-factor authentication if the request is from an unregistered contact.
- Acknowledge the request and freeze/block the account within **15 minutes** during trading hours or before the next trading session if received outside trading hours.
- Cancel all pending orders in the account.
- Notify the client via registered email and SMS about the freeze/block action, including details of pending orders and the process for re-enabling access.
- Provide details of open positions and contract expiry within **one hour**.

4. Re-Enabling Account Access

Clients may request to unfreeze/unblock their trading account by:

- Sending a request through registered communication modes.
- Undergoing due diligence and verification procedures. The account will be re-enabled promptly after completing necessary validations.

5. Record Maintenance

The firm will maintain detailed records of:

- All requests for freezing/blocking and unfreezing/unblocking.
- Corresponding actions taken, including timestamps and client communications.

CIN: U65990WB2020PTC236640

Registered Office: 59, Bentinck Street, First Floor, Kolkata – 700069.

Contact Number: 033-79629631

Email Id: estellegroup@hotmail.com Compliance Officer: architrustagi12@gmail.com

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6. **Disclosure of Policy** This policy is publicly available on our website at www.estellesecurities.in

- It will be provided in the account opening kit for new clients from **July 1, 2024**.
- Existing clients will receive this policy via email or alternative means by **July 1, 2024**.

7. Accountability

The firm is responsible for any transactions executed after receiving a freeze/block request and before the account is frozen/blocked within the prescribed timeline.

8. Contact Information

For requests or clarifications, please contact:

- Email: estellegroup@hotmail.com
- Phone: 033-79629631 / 033-40070642

This policy is part of our commitment to safeguarding our clients' trading accounts and ensuring a seamless experience in line with regulatory requirements.

Scenario	Timelines for issuing acknowledgement as well as freezing / blocking of the online access of the trading account.
Request received during the trading hours ¹ and within 15 minutes before the start of trading.	Within 15 minutes ²
Request received after the trading hours and 15 minutes before the start of trading.	Before the start of next trading session

¹Trading hours shall be as follows:

Capital Market Segment: 9.15 a.m. to 3.30 p.m., Equity Derivatives Segment: 9.15 a.m. to 3.30 p.m., Currency Derivatives Segment: 09.00 a.m. to 05.00 p.m., Commodity Derivatives Segment: 09.00 a.m. to 11:30 p.m.

² To begin with, the time limit of 15 minutes is being specified for the purpose of issuing acknowledgement as well as freezing/blocking of the online access of the trading account. This time limit shall be contracted after a review in next six months after the date of its applicability to enhance protection of investors from suspicious activities.