



Policy on Voluntary Freezing/Blocking of Online Access Policy for Trading Accounts
Ref: SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024

1. Introduction

This policy outlines the procedures for voluntary freezing of trading accounts for clients of Zanskar Securities Private Limited (hereinafter referred to as Nubra) in accordance with SEBI & Exchange Circulars.

2. Purpose

This policy aims to guide Nubra clients on the process, modes, timelines, and other details for facilitating the voluntary freezing of their trading accounts upon noticing any suspicious activity.

3. Scope and Applicability

This policy is applicable to all Nubra clients who wish to voluntarily freeze their online trading accounts

4. Policy Statement:

Clients of Nubra have the option to voluntarily freeze or block online access to their trading accounts for a specified period, as per the guidelines outlined by the SEBI/Stock Exchanges. This policy ensures that clients can exercise their rights to voluntarily freeze/block the online access of the trading account temporarily on account of suspicious activities. Based on the framework set by SEBI and exchanges, detailed guidelines are explained in this policy.

5. Procedure:

5.1. Request for Freezing/Blocking:

Clients who wish to freeze or block online access to their trading accounts must submit a formal request to Nubra through any one of the following methods:-

- A. Email from registered email ID to dedicated email ID: stoptrade@nubra.io
- B. Client can freeze/block their trading account by below methods
Logon to account. Profile > Account Settings > Segments > Kill Switch and select segments to block trading
- C. Call support helpdesk to freeze your account

5.2. Verification and Processing timelines:

Upon receiving the request, Nubra shall verify the client's identity and ensure that the request aligns with the guidelines provided by the regulatory guidelines. Nubra shall also take the following steps:-

- A) Issue the acknowledgement as well as freeze/block the online access of the client's trading account and simultaneously cancel all the pending orders of the requested client.
- B) The timelines for freezing/ blocking of the online access of the clients' trading account is as under: -

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 close of trading.	Before the start of next trading session

1 Trading 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.

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.

5.3. Confirmation:

Post freezing/blocking the client's trading account, send a communication on the registered mobile number and registered e-mail ID of the client, stating that the online access to the trading account has been frozen/blocked and all the pending orders in the client's trading account, if any, have been cancelled along with the process of re-enablement for getting the online access to the trading account.

Details of open positions (if any) should also be communicated to the client along with contract expiry information within one hour from the freezing/blocking of the trading account.

5.4. Maintenance of records:

The Trading Member shall maintain the appropriate records/logs including, but not limited to, request received to freeze/block the online access of trading account, confirmation given for freezing/blocking of the online access of the trading account and cancellation of pending orders, if any, sent to the clients.

5.5. Re-enablement:

At the end of the freezing/blocking period, online access to the client's trading account will be reinstated automatically unless otherwise specified by the client. Client can place a request for the reinstatement of online access by submitting a formal request to Nubra through the following method:-

A) Website.

B) Clients can call the dedicated support line at and follow the agent's instructions.

Nubra shall carry out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account before re-enablement of the online access of trading account within approximately 30 minutes.

6. Clarifications

- Freezing/blocking is only for the online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of the Nubra.
- The request for freezing/ blocking does not constitute request for marking client Unique Client Code (UCC) as inactive in the Exchange records.

Important Points to Note:

- It is advised that the client closes all his open positions before giving the request for freezing the account.
- Client's account will be blocked, within 15 minutes of receiving the freeze request.
- Confirmation of the freeze of the account will be sent via email and SMS, including the process to

unfreeze the account.

- d. All pending orders, whether placed online or offline by the client, will be cancelled by the system and trading access will be blocked.
- e. Clients will receive details of any open positions along with contract expiry information within an hour of freezing the account.
- f. Upon freezing, the client will be logged out of the app but can log in for exploratory purposes without the ability to place trades.
- g. New SIPs will not be executed while the account is frozen.
- h. Fund addition and withdrawal will be allowed, but profile modifications will not be permitted.
- i. It is recommended to change the login PIN immediately after freezing the account. This can be done by navigating to Accounts → Settings → Change PIN.
- j. Clients with open positions can call on latest number mentioned on the website. to close them.
- k. To unfreeze the account, clients can call at on latest number mentioned on the website. .
- l. In case of margin shortage, client position will be auto squared off to the extent of margin shortage.
- m. If a client's account has a negative balance for T+5 days, their investments will be sold to cover the amount owed.
- n. Any open position under Intraday product will be auto squared off by the system as per the Intraday product policy

7. Review:

This policy shall be reviewed periodically to ensure its effectiveness and compliance with regulatory requirements. Any necessary revisions or updates, if require shall be made accordingly.

8. Conclusion:

This policy outlines the procedures and guidelines for clients who wish to voluntarily freeze or block online access to their trading accounts on account of suspicious activities in accordance with the exchange guidelines. By adhering to these guidelines, Nubra aims to facilitate a seamless process for clients to exercise their rights while maintaining regulatory compliance.