

SMART BY KNA

Smart by KNA is mobile app for stock trading of M/s KNA Share Brokers Pvt. Ltd. allows users to check the performance of the stock market, mobile trading apps provide access to online trading platforms, which can be utilized to execute trades instantly from anywhere. Every major broker has an Android app or iPhone app or both, to allow their customers to trade directly from their mobile devices in a secure way.

Mobile trading has allowed individuals to become traders and investors, not only from the comfort of their own homes, but also from anywhere in the world with an Internet connection. This means that people can trade from work or even on vacation in faraway lands. Mobile seems to be the most convenient and indeed cheapest way for most people to trade

MOBILE DEVICE USAGE POLICY

For Employees and Associated Persons of KNA Share Brokers Pvt Ltd.

Version: 1.0

1. Purpose

This policy defines the rules and acceptable usage of mobile devices within KNA, in compliance with SEBI/NSE regulations, to ensure the security of confidential data, protect client information, and avoid misuse of electronic communication in the securities market.

2. Scope

This policy applies to all employees, dealers, authorized persons, sub-brokers, and third-party vendors/consultants who access company systems or handle client data using mobile phones or tablets, whether company-issued or personal (BYOD).

3. Definitions

- **Mobile Device:** Includes smartphones, tablets, and similar portable communication devices.
- **BYOD:** Bring Your Own Device – use of personal mobile devices for official purposes.

4. Policy Guidelines

4.1 Permitted Usage

- Mobile devices may be used strictly for official communication, subject to approval from Compliance/IT.
- Access to emails, ENIT, trading terminals (view-only), and compliance apps must be through secure channels.
- WhatsApp/Telegram or similar apps **should not** be used for order placement or trading-related instructions.

4.2 Prohibited Usage

- No order shall be accepted or executed via voice call or messaging apps.
- No personal trading or investment advice should be shared over mobile unless permitted by regulation and recorded.
- Recording of client data, screenshots of confidential systems, or forwarding internal documents is strictly prohibited.

4.3 Security & Monitoring

- All mobile devices accessing company systems must be password-protected and may be subject to audit or remote wipe.
- Use of VPN or encrypted apps is mandatory when accessing internal systems from mobile.
- Devices must have anti-virus and regular OS updates installed.
- All official communications should be archived in compliance with SEBI circulars (e.g., SEBI/HO/MIRSD/TPD/CIR/P/2021/14).

4.4 Trading Floor Restrictions

- Mobile phones of dealers are to be kept outside the dealing room or in a locked box during trading hours unless allowed by the Exchange with voice recording compliance.
- All voice-based interactions in the dealing room must be on recorded landline channels only.

4.5 Data Protection & Confidentiality

- Employees must ensure no sensitive or client-related information is stored or shared through unapproved mobile apps.
- In case of loss or theft of the device, the same must be reported to the Compliance Officer within 24 hours.

5. Roles & Responsibilities

- **Compliance Officer:** Ensures enforcement and monitoring of the policy.
- **IT Department:** Maintains device access logs and enforces security protocols.

- **All Users:** Responsible for ensuring secure and appropriate use as per this policy.

6. Disciplinary Action

Violation of this policy will result in disciplinary action including warning, suspension of system access, or termination, and may be reported to the Exchange or SEBI, as applicable.

7. Review & Updates

This policy shall be reviewed annually or upon any regulatory update, whichever is earlier.