



COMPANY POLICY

Goodwill Wealth Management Pvt Ltd.

SEBI Reg. No - INZ260006739

CAPITAL MARKET

Trading Member ID - MSEI - 11240 | NSE. - 90097 | BSE - 6648

CDSL DP ID - 12084200, IN - DP - CDSL - 309 – 2017

COMMODITY

Trading Member ID - MCX - 11095 | ICEX. - 2035

Ver .2.1
01.06.2019

INTERNAL CONTROL POLICY

- I. **User Management:** Users are created as per respective exchange norms and clients who are completing KYC only will be allowed to trade in the exchanges. After allotting Unique Client Code (UCC) to client CRD team will be uploaded to respective exchange. After getting approval from the exchange will upload client details in our trading application and will issue User ID and Password for accessing trading application.

- II. **Access Control Policy:**
 - a. **Client Level:** Only authorized user can access Trading Application using User ID and Password allotted to them. Client will be prompted for “**Two Factor Authentication**” (2FA) on successful entry of all the above will be able to enter into Trading Application. Also can retrieve data only related to his/her own client code. Data travels in encrypted format to ensure security of data. Firewall will act as a gateway for IBT users and Server Machine.

 - b. **Branch Level:** CTCL user ID will be issued to all the branches after uploading details to the respective exchanges. Password will be sent through mail to the registered branch mail ID. In case password locked due to wrong entry of three consecutive attempts RMS department will reset and send the password on request from the registered mail ID only. Data can be retrieved only for the clients mapped under the CTCL ID.

 - c. **LAN Users:** Admin systems are connected through LAN segment with Application server for Risk Management System. Username and Password will be given to RMS team. Admin systems are involved in creation of client ID, CTCL ID, Limit setting, Monitoring MTM, Suspending inactive clients from trading and etc.

 - d. **App & DB Server:** Physical entry of server room is restricted by access card and entries and exits are monitored by CCTV camera in server room cum Data centre. Server systems are protected with username and password. Access to the Database is kept confidential by Application vendor. Separate User ID and password are given to the personnel entering into server room for accessing application.

Note: List of Authorized persons to enter Server room cum Data Centre can be changed time to time.

III. Walk in Client Access Control Policy

- a) Client Walkin Register
- b) Walkin clients are authorised to enter officer premises only after he sign the walkin register mentioning his client code ,client name and mobile number
- c) Intime and outimes are maintained and duly signed by the client,
- d) Clients are allowed to leave the premises after duly signed his order and trade confirmation sheet ,in case of not signed the next trading day he's not allowed to trade further