

LANKA SECURITIES (PVT) LTD

Call Recording Policy

Contents

1.	Purpose.....	1
2.	Recorded Information.....	1
3.	Purpose of Call Recordings.....	1
4.	Advising Callers and Staff that calls are being monitored/recorded	2
5.	Retention and Storage of Call Recordings	2
6.	Security of Call Recordings	2
7.	Access to Call Recordings.....	3

1. Purpose

The purpose of this policy is to govern the procedures for telephone call recording within Lanka Securities (Pvt) Ltd (LSL) and the management of access to and use of the recordings.

The policy aims to minimize intrusion by restricting the recording of calls and the access to and use of these recordings to limited and specific purposes.

2. Recorded Information

LSL Head Office telephony system is capable of recording calls. All calls received into the Head Office are recorded. Calls are recorded using the Phonik IP call recording system provided by iPhonik (Pvt) Ltd.

All Extensions are recorded for outgoing and incoming calls.

Any expansion of current scope will require a review of the Data Protection Impact Assessment (DPIA) and approval by Managing Director.

3. Purpose of Call Recordings

Calls are recorded and retained for the following purposes:

- To ensure we have an accurate record of the call, to support any customer transaction that takes place over the phone.
- To ensure Investment Advisors (IA) have a proper record to confirm order details given by clients.
- Establishing the facts in the event of a complaint by a customer or member of staff and used in evidence during any associated investigation.
- For reporting on the types and numbers of enquiries received.
- Prevention or detection of crime, or for the investigation, apprehension or prosecution of offenders, where the offence concerned involves any unlawful claim for any payment out of, or any unlawful application of, public funds.
- For the purposes of, or in connection with, any legal proceedings (including prospective legal proceedings).
- Staff training purposes, helping us to improve the quality of our customer services and to ensure the information we provide is consistent and accurate.

4. Advising Callers and Staff that calls are being monitored/recorded

LSL will make every reasonable effort to communicate that calls will be recorded. This will be done by:

- Informing the caller when call recording facilities are being used.
- Investment Advisors are instructed to confirm order details to client/s by calling using land line, if they do not have a written instruction from client.
- Every staff member has signed and agreed to this policy.
- This policy is published on the LSL website: www.lsl.lk
- This policy is published on the LSL intranet and staff are aware of the location of this policy.

5. Retention and Storage of Call Recordings

Call received into LSL will be retained for 6 years. LSL currently holds calls from 5th July 2019. Calls will be archived to a secure internal server and can be retrieved by using the call retrieval process for these records. Calls records are securely held on LSL telephone system and can be accessed by authorized staff. Authorized staff is Managing Director, Finance Director and Head of IT.

6. Security of Call Recordings

Access to call recordings is controlled in line with LSL information security policy.

The LSL Head of IT oversees the processes, policy and procedures associated with all voice recording including auditing.

Access to the recording systems is limited to Managing Director, Finance Director and Head of IT.

Any unauthorized access may lead to consideration of disciplinary action. Browsing of recordings for no valid reason is not permitted

7. Access to Call Recordings

Requests for call recordings from individuals are handled through a Subject Access Request (SAR) and such requests must be made in writing to the Managing Director or Finance Director. Please refer to the LSL INFORMATION SECURITY POLICY.doc for further information regarding Subject Access Requests.

Specific call recordings may be accessed by Managing Director or Finance Director or any Disciplinary Hearing Panel as evidence in relation to any disciplinary process. In these cases requests for access (made in writing) may only be granted by LSL Managing Director.

Copies of calls requested in relation to Subject Access Requests, Fraud Investigations and Complaints must be approved by Managing Director or Finance Director in line with internal guidance.

In the case of a request from an external body with law enforcement powers in connection with the prevention, detection or investigation of crime e.g. Securities and Exchange Commission of Sri Lanka (SEC), Colombo Stock Exchange (CSE), the Police etc. The request must be made in writing to LSL Managing Director who will consider the request.

Access to call recordings for any other purposes is only allowed to satisfy a clearly defined business need. Written requests detailing the reason for requesting access must be formally authorized by Divisional Head and in the relevant business area and then sent to the LSL Head of IT.

All approved requests for call recordings will be actioned by the LSL Head of IT. The Sri Lankan government Data Protection legislation allows persons access to information that we hold about them. This includes recorded telephone calls. Therefore, the recordings will be stored in such a way to enable the Data Protection Officer to retrieve information relating to one or more individuals as easily as possible.