

Biswarup Sinha Ray

Dear Sir/ Madam,

Compliance with SEBI circular SEBI/HO/MIRSD2/DOR/CIR/P/2020/221 dated November 3rd 2020 for BASL Member Id 1215

SN	IA/RA Enlistment Number	IA/RA Name	Whether using any SaaS based solutions (Yes / No)	Name of SaaS/ Hosted Service	Type (SaaS or Hosted Service)	Critical/ non-critical	Location of hosting of SaaS/ Hosted Service (Within India/ Outside India)	Comments (if any)
1	1215	Biswarup Sinha Ray	Yes	smallcase Publisher	SaaS	Critical	India	Technology platform for managing investment advisory business
2	1215	Biswarup Sinha Ray	Yes	Google Workspace	SaaS	Non-critical	Global, Outside India	Used primarily for email, etc.

Declaration

I confirm that, to the best of my knowledge and understanding:

- The above SaaS products are being used for the stated purposes.
- Data residency control is maintained for smallcase Publisher platform within India; refer to the attached declaration from the service provider; for Google Workspace, India-specific residency option is not available as of now.

Based on the above, to the best of my knowledge and understanding, compliance of the SEBI circular for advisory regarding Software as a Service (SaaS) based solutions has been made.

Regards,

Biswarup Sinha Ray

[Investment Adviser, Individual]

License Holder Name: Biswarup Sinha Ray

SEBI Registration No.: INA300008614 [Investment Adviser, Individual]

Validity: 26-10-2017 - Perpetual

BSE Membership No.: 1215

Brand Name: ViniyogIndia®

Support Telephone: +91 6291268415 Support Email: contact@viniyogindia.com

Investment Adviser | Compliance Officer | Grievance Officer: Biswarup Sinha Ray E: sinharay.cap@gmail.com T: 62912 68415

Registered Address: 17/2D K P C Lane, Kolkata 700034

Business Address: Tower 26, 13th Floor, No. 13D, Genexx Valley Kolkata 7000104

<https://viniyogindia.com>

Date: 09-05-2025

To,

Biswarup Sinha Ray

17/2D K. P. Chatterjee Lane, Behala,

KOLKATA, WEST BENGAL, 700034

Dear Biswarup Sinha Ray,

This is with reference to our Business Partnership Agreement (Agreement) dated 19 January 2021 between Biswarup Sinha Ray (INA300008614) and Smallcase Technologies Private Limited (STPL), wherein STPL provides technology solutions to Biswarup Sinha Ray.

As requested by you, we wish to confirm the following:

- i. We hereby state that to the best of our knowledge and information and basis the confirmation from our cloud service provider, that the data pertaining to your business resides on servers, which are located within the legal boundaries of India.
- ii. We protect the data stored on our platform using layered defense approach and ensure seamless protection against insider or external threats.
- iii. We ensure complete protection and seamless control of the critical systems of our platform by continuous monitoring through direct control and supervision protocol mechanisms.

This confirmation is being issued at your specific request.

Thanking You,

Yours Faithfully,

For Smallcase Technologies Private Limited

Jatin Bhatia



Jatin Bhatia

Vice President, Business

smallcase Technologies Private Limited

No. 51, 3rd Floor, Le Parc Richmonde, Richmond Road, Shanthala Nagar, Bengaluru - 560025

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