



Affinisio (SDD)

Structured Digital Database

Structured digital database software for listed intermediaries, maintained internally

PRO Series

*Part of the Affinisio Family of
Applications.*



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What is Affinisio(SDD)

The PRO Series of Affinisio(SDD) serves intermediaries whose own securities are listed, for compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015.

It records every instance of UPSI sharing, internal and external: the nature of the UPSI, who shared and who received it, their identifiers and the time. Every entry is time-stamped, and every correction is a further audited event.

Regulation 3(5) says the database “shall not be outsourced and shall be maintained internally”. Affinisio(SDD) is built to that requirement.

Your database, on your infrastructure, under your administration. Affinisio never has access to your UPSI.

It runs on-premises or in the firm’s own private cloud tenancy, never on Affinisio-maintained infrastructure.



Listed intermediaries

Firms holding UPSI of their own listed entity and of the listed entities they act for, kept apart in one system.

PRO Series

For intermediaries that are listed: own-entity and client UPSI in one system, barriered where required.

Home or Other Entities

Create projects for the home entity and client entities from the project page.

Affinisio(SDD) and the Regulations

Own and Client UPSI, Managed Centrally

Designed to manage UPSI for the firm itself and for its clients centrally, with inbuilt barriers to keep the two separate.

Fully Certified

PCS Certified for SEBI regulatory compliance.

Time-Stamped Audit Trails

Each entry time-stamped with detailed audit trails, unalterable.

SDD Report

Updated automatically, always extractable.

Inspection Tested

Across many corporates and inspection cycles.

Two Capacities, One System

When an organisation holds UPSI as a listed entity and as an intermediary or fiduciary

An organisation can hold unpublished price sensitive information in two capacities at once. As a listed entity, it maintains a structured digital database of its own UPSI under Regulation 3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015. As an intermediary or fiduciary, it also handles UPSI of the listed companies it serves. Regulation 9A(2)(d), read with Schedule C, requires it to keep a list of everyone with whom that UPSI is shared. SEBI's FAQs say such an intermediary or fiduciary maintains another structured digital database internally for it.

A listed bank is one example. Its own results and capital raising are its own UPSI. What it learns while sanctioning credit, restructuring debt or sitting on a committee of creditors is UPSI of its borrowers. The Explanation to Regulation 9(2) names banks among fiduciaries. The two records serve different obligations and must be kept apart: different designated persons, different restricted lists, and no flow of information between them without a legitimate purpose.

The **PRO Series of Affinisio(SDD)** addresses both requirements. Own and client UPSI are recorded in one internally maintained system. Inbuilt barriers keep the two separate and even hide the existence of external persons and entities between the two sides.

Regulation

SEBI (Prohibition of Insider Trading) Regulations, 2015: Regulation 3(5); Explanation to Regulation 9(2); Regulation 9A(2)(d); Schedule C.

[SEBI FAQs on the PIT Regulations](#)

In Mint

Mr. Nishant Shah on the SEBI requirement for banks to maintain two separate structured digital databases.

[Dual-SDD.](#)

[Banks – Nishant Shah Comments in Mint](#)



Affinisio(SDD) - Features



Listed Intermediaries: PRO Series

PRO

For intermediaries that are listed: own-entity and client UPSI in one system, barriered where required.

Complete Regulatory Compliance

- PCS certified for SEBI regulatory compliance, with immutable and detailed audit trails and time stamping
- SDD report updated automatically and always extractable, in multiple digital formats
- Custom regulatory reports, ready for SEBI inspection, with extracts by project or by person

UPSI Capture & Workflows

- Flexible UPSI entry logging — capture as sender, receiver or central point of contact in one smooth flow
- Intuitive UPSI workflows that guide every entry
- Group UPSI capture — log one event across multiple recipients in a single entry

- UPSI entries auto-filed to each individual's account as sender or receiver
- A library of pre-created UPSI descriptions, controlled by the Compliance Officer for consistent, audit-ready entries
- Custom UPSI descriptions where standard labels don't fit
- Automated email intimations to all parties upon logging of entries

Deal Teams & Information Barriers

- Project-specific deal teams, with project access limited to their own engagements
- Information barriers by deal team and by project, with code-names to mask certain UPSI events
- Own and client UPSI in one system, barriered by teams so the listed-company side and the client-facing side stay apart

Listed Intermediaries: PRO Series (continued)

PRO

For intermediaries that are listed: own-entity and client UPSI in one system, barriered where required.

Entities & Contacts

- Extensive pre-loaded database of listed entities
- Self-create “to-be-listed” entities for pre-IPO and proposed-listing engagements
- Unlimited internal and external contacts — counterparties, advisors and other fiduciaries — which all personnel can create and add persons to
- Pre-register intermediaries for cleaner cross-entity sharing records

Integration & Deployment

- Robust, enterprise-grade security with SSO and LDAP integration

- Fully integrated user management and security administration section, with regulatory roles-based data restrictions and separate controls for internal and external persons
- People data via one-click bulk upload
- Smart Compliance Control Panel
- On-Premises deployment for full data ownership
- Flexible deployments optimised for your organisation’s owned cloud infrastructure
- Web, desktop and mobile
- Multiple user plans to suit each organisation
- Part of the Affinisio PIT Suite with Affinisio(ETT) and Affinisio(IDD); modules can be procured individually or as a set

Listed Intermediaries: PRO Series (continued)

PRO

For intermediaries that are listed: own-entity and client UPSI in one system, barriered where required.

Advanced PRO Variant

- Barriers on knowledge of the very existence of other parties, restricted to designated members of a deal team
- UPSI super-grouping, to provide alternative descriptions to UPSI for easy response to regulatory inquiries
- Home or other entities — create projects for the home entity and client entities from the project page seamlessly

Optionals & Integrations

- Zero-touch email capture — tagged emails auto-logged internally and securely
- Alerts for unrecognised senders or receivers, post-facto PAN updates preserving date and time of UPSI flow
- UPSI contained in email body never captured
- Intelligent approval workflow when recording UPSI on behalf of others

Integrations

Standard integrations

Internal SMTP, single sign-on (SSO) and LDAP, as standard: notifications sent through your own mail servers, and sign-in and directory services through your own SSO and LDAP.

Custom integrations

Available on the PRO Series as customisation, agreed in the client's contract.

HRMS integration

People data synchronised from your HRMS, with independent and restricted access for your HR team. One-click bulk upload of people data is available without it.

Graph API and MFA

Graph API and multi-factor authentication added to the user management and security administration section.

Deal, project and onboarding systems

Pre-existing data from deal and project management, time-sheets, client onboarding and ERP applications, so the same details are not entered twice.

Email auto-capture set-up



Set-up of zero-touch email capture on your internal mail domain, so tagged emails are logged and the UPSI in the email body is never captured.

Migration from existing SDD software

Historical SDD data brought over from existing software by bulk update, including the time-stamps of past recordings, with pre-verification before upload.

Affinisio(SDD) - Details



Maintained Internally, Never Outsourced

Built to Regulation 3(5), not simply adapted to it

Regulation 3(5) requires that the database “shall not be outsourced and shall be maintained internally”.

Affinisio(SDD) is deployed on infrastructure the entity owns and administers, and the database is created and held there. Every entry is time-stamped at the point it is made, with the audit trail kept at database level.

A correction records what changed, by whom and when.

Mistakes do happen, corrections need to be auditable, not impossible.



No Vendor Access to Your UPSI

Your record, held by you, for at least eight years

SEBI's FAQs of 31 December 2024 say that where the vendor maintains the server, "the vendor may have access to such records which would be contrary to the regulations". Affiniso(SDD) is not supplied on that model. The database sits on infrastructure the entity owns, or holds as its own tenancy, under its own credentials.

Retained as long as your policy requires, beyond the eight-year minimum in Regulation 3(6), with no vendor-imposed limit.



Built for Listed Intermediaries

Own and client UPSI, kept apart

UPSI of your own listed entity and of the listed entities you act for is held in one system, with information barriers built on predefined deal teams at project level, so the listed-company side and the client-facing side stay apart, and a further barrier on knowledge of the existence of other parties. Listed or to-be-listed entities are added as mandates arise, from a pre-loaded register, with UPSI super-grouping.



Centralise SDD Compliance

One access ID for the Compliance Officer

Compliance Officers monitor entities, persons, policies, users, projects and audit trails centrally, through a single access ID, and can log UPSI flow on behalf of senders or receivers, individuals or groups. The database follows your structure, teams, functions and roles, however you are organised, including personnel shared across group entities.



Emails Populate the SDD, Not You

Tagged emails only, never the UPSI they contain

Tagged emails are captured automatically into the project they belong to, internally and securely, with no CC'ing and no additional steps. UPSI contained in the email body is never captured. Emails from unrecognised senders or receivers raise an alert, and PAN details can be updated afterwards with the date and time of the UPSI flow preserved.

Zero-touch email capture is available on the PRO Series.



Your SDD Fits Your Existing Systems



Migrate from existing SDD software, or integrate

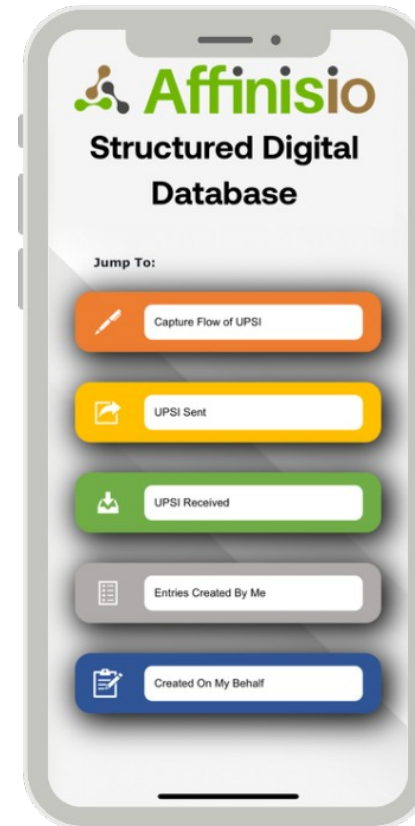
Affinisio(SDD) fits into current workflows and systems, whether you are migrating from existing SDD software or connecting it to HRMS, ERP, single sign-on, LDAP, deal management, time-sheeting or client onboarding applications. Imports are pre-verified and pre-validated before upload, and PAN and email formats are validated on entry.

Internal SMTP, SSO and LDAP are standard; other integrations are customisation on the PRO Series.

Fewer Steps to SEBI PIT Compliance

Multi-action capture, on one screen

UPSI flow is logged as sender or receiver, for yourself or for others, to individuals or groups, in one motion on one screen. Functional groups and deal teams populate each member's details in one click, and every user sees the UPSI they shared and received, sorted for them.



Control Your SDD Compliance Policy



Set the quality controls and channels your policies require

The compliance team configures its own policies: pre-created and one-click UPSI descriptions for quality control, options enabled or disabled across the organisation, permissible communication channels, KYC documentation and record retention.



Infrastructure Control Support



Deployed Remotely, Runs Internally



Installed remotely into your own internal instance, through limited and controlled access that you grant. Nobody needs physical access to your servers.

Installation is done remotely into the entity's own instance. The structured digital database is created there and stays there, maintained internally and not outsourced, as Regulation 3(5) requires.

Any Form Factor, Anywhere

Every function on every authorised device, from phone to tablet to laptop, with nothing cut back for the smaller screen.

Employees log UPSI flow, and see what they have shared and received, on web, desktop or mobile, from whichever authorised device they are using. Compliance Officers have the same access.



Physical Servers or Internal Cloud



Local hardware or your own internally controlled cloud, across production, UAT, DC, DR and HA. Your data sits in its own tenant and is never mixed with anyone else's.

Affinisio(SDD) is designed for fully internal deployment. It runs on Ubuntu or Windows, on a single server or with the application and the database on separate servers.

Your Own Infrastructure

Cloud infrastructure you own, or a tenancy procured in your name, on Azure or Amazon Web Services, administered under your own credentials.

For Affinisio(SDD), the cloud must be one the entity owns, or holds as its own tenancy, and administers under its own credentials. SEBI's test is administrative control, not physical location.



Integrate To Environment Seamlessly



Connects to HRMS, internal SMTP, single sign-on, LDAP and transaction systems, with full API support.

Internal SMTP, single sign-on and LDAP are standard. The other integrations described earlier in this deck (HRMS, Graph API and MFA, deal and onboarding systems, email capture set-up and migration) are custom integrations, available on the PRO Series and agreed in the client's contract.

Your Data, Your Choice of Databases

Run on a database you already licence, or on the PostgreSQL deployment included with Affinisio, so the database need not be a separate cost.

MS-SQL, Postgres and Oracle are supported. Postgres is packaged and containerised at no additional charge, and MS-SQL, while supported, is not needed. The database stays on infrastructure the entity controls.



On-Premises Support Expertise



Support for on-premises deployments without access to your data, with on-screen tips, manuals, FAQs, screen-by-screen guidance and a support portal.

Support is given without access to the entity's data, so Affinisio never sees the UPSI flows or persons recorded. Usage guides, FAQs, page-wise instructions and training videos come with it.

Contact & Details

Scan a code, or click its name below to open the page.



[Affinisio\(SDD\) page](#)

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