



Who Must Comply & Who's Exempt?

Your Threshold-Based Guide to SEBI Cybersecurity Compliance Framework





How are Stock Brokers categorized based on client count or trading volume?

Qualified REs: >10 lakh clients or >₹10 lakh Cr volume

Mid-size REs: 1–10 lakh clients or ₹1–10 lakh Cr volume

Small-size REs: 10,000–1 lakh clients or ₹10k–1 lakh Cr volume

Self-Certified REs: 1,000–10,000 clients or ₹1k–10k Cr volume

Swipe





Who among Stock Brokers is exempt from cybersecurity compliance?

Less than 1,000 clients

Trading volume below ₹1,000 Cr

Swipe





Are Depository Participants (DPs) always required to comply?

- DPs registered as brokers: Follow Stock Broker thresholds
- DPs not registered as brokers:

Exempt from SOC/M-SOC if they have <100 clients





How are Portfolio Managers classified for compliance?

- Mid size Re's AUM > ₹3,000 Cr
- Self Certified Re's AUM ≤ ₹3,000 Cr

Self-certification REs with < 100 clients are exempt from onboarding to a Managed Security Operations Center (M-SOC).





How are AIFs and VCFs classified for compliance?

- ● Qualified REs: \geq ₹10,000 Cr
- ● Mid-size REs: ₹3,000–<₹10,000 Cr
- ● Self-Certification REs: \leq ₹3,000 Cr

Self-certification REs with < 100 clients are exempt from onboarding to a Managed Security Operations Center (M-SOC).





Do Investment Advisers (IAs) and Research Analysts (RAs) need to comply?

Only if registered under another SEBI category (e.g., Stock Broker, Portfolio Manager).





Are KRAs (KYC Registration Agencies) ever exempt?

No. All KRAs are considered Qualified REs and must fully comply with SEBI's cybersecurity requirements.



How CSCRF Provisions Vary by SEBI RE Classification?

Qualified REs must comply with all mandatory provisions at the highest standards (including external audit, HSM, M-SOC, full governance etc).

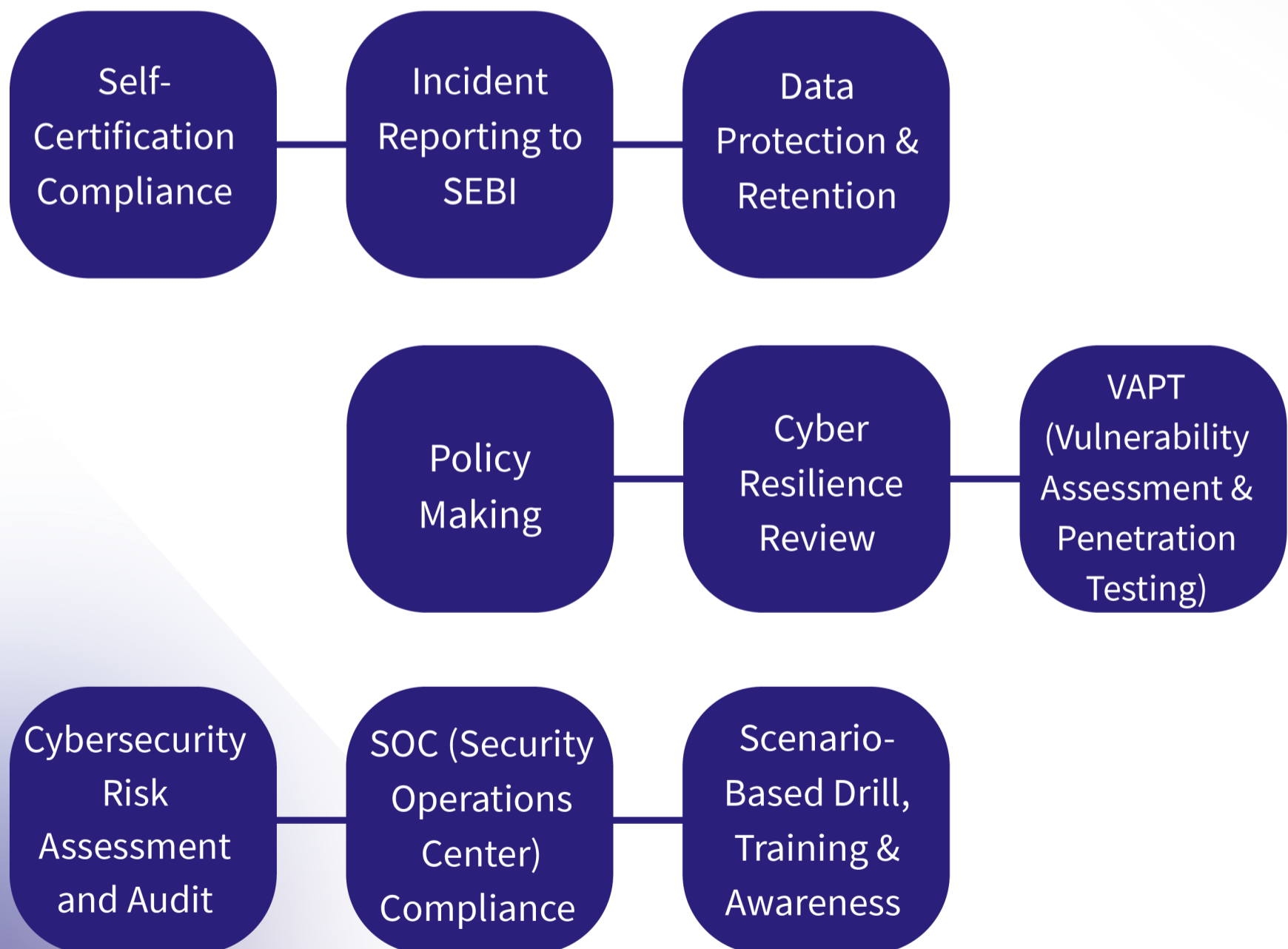
Mid-size & Small-size REs must comply with most controls, but can replace HSM with board-approved alternatives and do not need a CISO—only a responsible officer in certain areas.

Self-certified REs can complete requirements by self-certification only (no yearly external audit, HSM not mandatory, and often exempt from M-SOC if <100 clients).

REs below the self-certification threshold are entirely exempt from CSCRF.



What Cybersecurity Provisions are mandatory for all non-exempt REs?



**Avoid Penalties.
Ensure Full
Compliance Now.**

Deadline: 31st August

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Take action today:

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