

Draft Circular for public comments

Circular on Relaxation of India geo-tagging for NRI client's re-KYC/KYC modification through digital on-boarding/ video client Identification process (V-CIP)

1. Based on the request received from stakeholders in securities market, SEBI intends to modify the existing provisions under Master Circular on KYC dated October 12, 2023 to ease the requirements for NRI clients to be physically present in India during KYC modification / re-KYC during digital on-boarding/ video client Identification process (V-CIP).
2. In view of this Para 51 of Master Circular on KYC proposed to be modified as under:

The App shall also have features of random action initiation for client response to establish that the interactions are not pre-recorded along with time stamping and geo-location tagging to ensure the requirement like physical location being in India etc are also implemented. The requirement of physical location of client being in India during digital on boarding shall be relaxed for re-KYC / KYC modification for existing clients.

The App shall also ensure that the GPS location (latitude and longitude) captured by the intermediary matches with the latitude and longitude of country given in Proof of Address of the client and the app shall also prevent connections from spoofed IP address.

Public Comments

3. Considering the significant role that clients and intermediaries play as key stakeholders in KYC process, comments are invited on the proposals mentioned in the draft circular. The draft circular on "Relaxation of India geo-tagging for NRI client's re-KYC/KYC modification through digital on-

boarding/ video client Identification process (V-CIP) ” is placed at Annexure.

4. The comments / suggestions should be submitted latest by Nov 13, 2025 (21 days from the issuance of Consultation Paper) through the following link:

<https://www.sebi.gov.in/sebiweb/publiccommentv2/PublicCommentAction.do?doPublicComments=yes>

5. In case of any technical issue in submitting your comment through web based public comments form, you may write to consultationMIRSD@sebi.gov.in with the subject: “Comments on draft Circular on Relaxation of India geo-tagging for NRI client’s re-KYC/KYC modification through digital on-boarding/ video client Identification process (V-CIP)”

Issued on: October 23, 2025

Draft Circular

SEBI/HO/MIRSD/SECFATF/P/CIR/2025/XX

Nov XX, 2025

To,

1. All intermediaries registered with SEBI under Section 12 of the Securities and Exchange Board of India Act, 1992
2. Stock Exchanges

Dear Sir/Madam,

Subject: Relaxation of India geo-tagging for NRI client's re-KYC/KYC modification through digital on-boarding/ video client Identification process (V-CIP)

1. SEBI received representation from multiple stakeholders to ease KYC access for Non-Resident Indians (NRIs). SEBI has decided to modify the existing provisions under Master Circular on KYC dated October 12, 2023 to ease re-KYC or KYC modification process for NRIs.
2. In this respect, the requirement of physical location being in India shall be relaxed for NRI clients to undertake due diligence through digital mode.
3. Accordingly, Para 51 of Master Circular on KYC shall be modified as under;

The App shall also have features of random action initiation for client response to establish that the interactions are not pre-recorded along with time stamping and geo-location tagging to ensure the requirement like physical location being in India etc are also implemented. The requirement of physical location of client being in India during digital on boarding shall be relaxed for re-KYC / KYC modification for existing clients.

The App shall also ensure that the GPS location (latitude and longitude) captured by the intermediary matches with the latitude and longitude of country given in Proof of Address of the client and the app shall also prevent connections from spoofed IP address.

4. This circular is being issued in exercise of the powers confined under Section 11(1) of the Securities and Exchange Board of India Act, 1992
5. This circular is available at www.sebi.gov.in under the link “Legal -> Circulars”