

# **PENNAR INDUSTRIES LIMITED**

## **DATA PRIVACY POLICY**

Covered under IT Policy Document No.: PIL/IT-01

Issue No.:01 Dated 01.01.2022

Issue No.:02 Dated 01.01.2023

Applicable for All Stake holders of Pennar Industries Limited

## DEFINITIONS

Personal data can be classified as SI or PSI and in any information relating to an individual who either directly or indirectly accesses Pennar Industries information. The processing of such data includes, the collection, storage, arrangement, preservation, transmission, modification, use, disclosure, download or deletion of SI and PSI data. Personal data includes the following information:

- Password.
- Details of financial information such as bank account, credit card, debit card or other payment method.
- A state of health that includes physical, physiological and mental health.
- Sexual orientation.
- Health information and history.
- Biometric data.
- Any other information related to the above provided by any person to Pennar Industries for the purpose of providing the Services.
- Any information received by the said Pennar Industries processes or stores such information pursuant to a legal agreement or otherwise.

Provided that information that is freely or publicly available under the Information Act 2005 or any other applicable law under a domain name will not be considered sensitive. Person "Employee" means a current or former employee of Pennar Industries. For employees, the policy covers all stages of the employment relationship, including recruitment and selection, promotion, evaluation and training.

"Related Person" means an employee, contractor and/or any other third party working on behalf of Pennar Industries and Jobseekers.

This policy applies to all personal information that Pennar Industries collects, receives, stores, owns, monitors, maintains, processes or processes.

Personal data and information that Pennar Industries processes on behalf of its customers in connection with the provision of conducting business services in accordance with the terms of the contract, special data protection practices are agreed with each customer.

This policy emphasizes the personal data responsibilities of data subjects in relation to the fulfilment of these obligations.

## PROTECTING SENSITIVE INFORMATION POLICY

### INTRODUCTION

This policy defines the norms to maintain the sensitive information related to organization during access to communication devices.

### SCOPE

Scope of this policy is to explain the method of protecting the sensitive or critical information on printing facilities such as printers and Local machines.

- All the employees of PENNAR INDUSTRIES LIMITED are aware that the sensitive information related to customer and customer business are not left unattended in the printer's / storage devices.
- All the employees of PENNAR INDUSTRIES LIMITED are communicated to treat any misdirected information delivered to them through unauthorized sources as sensitive and confidential information the same has to be reported to their Manager. Manager will consult IT Teams to verify the authenticity.
- Any unsolicited information received through local machines and "look official" information in any of the department of PENNAR INDUSTRIES LIMITED are considered for scrutiny to find the motive of such information.
- Intended recipients of the information are requested not to store the information in media that are in reach of unauthorized persons.

## INFORMATION PROCESSING POLICY

### Introduction

The Information processing policy defines the way to maintain the security of PENNAR INDUSTRIES LIMITED's information and information processing facilities.

### Scope

The scope of this policy extends to all the organization's information and the information processing facilities that are accessed, processed and communicated to, or managed by external parties.

### Policy Statement

- PENNAR INDUSTRIES LIMITED ensures that Information processing facilities and Communication of information to the external parties are access controlled.
- PENNAR INDUSTRIES LIMITED ensures that risk assessment is carried out for all the external parties in concern with the transfer on organization information.
- PENNAR INDUSTRIES LIMITED assures that all necessary control requirements identified during the risk assessment are agreed by external party and are defined in the service level agreement with the external party.

*Any questions about Information Processing will be resolved by the **Head IT**.*

## INFORMATION EXCHANGE POLICY

### Introduction

The Information exchange policy defines the method to maintain the security of the organization's information during access to communication devices.

### Scope

The scope of this policy extends to all the communication activities done in PENNAR INDUSTRIES LIMITED

### Policy Statement

- Conference call with in the employees of the PENNAR INDUSTRIES LIMITED are made only when the identity of all the parties of the conversation are identified.
- Video Conferencing calls from PENNAR INDUSTRIES LIMITED are permitted only when the staffs are aware of the Information security involved and ensured that the conference details are available only to the intended recipient of the information.
- Monitoring and recording details of the information are informed to all the staff well in advance about the need towards complying with PENNAR INDUSTRIES LIMITED policies and procedure.
- Any of businesses information to be shared to any party such as auditors and vendors for further processing such as GST & Tax. Departments to have a clear department NDA signed between Department Head and the party. The same has to be sent to legal team for validation of terms. Upon completion of verification the user department needs to send a copy to IT Department for records.

## Policy for Use of Software and Licensing

### Purpose of the Policy

This policy provides guidelines for the use of software for all employees within the business to ensure that all software use is appropriate. Under this policy, the use of all open source and freeware software will be conducted under the same procedures outlined for commercial software.

### Procedures Software Licensing

All computer software copyrights and terms of all software licenses will be followed by all employees of the business. Where licensing states limited usage (i.e. number of computers or users etc.), then it is the responsibility of Local IT Support to ensure these terms are followed.

Local IT Support is responsible for completing a software audit of all hardware twice a year to ensure that software copyrights and license agreements.

### Software Installation

All software must be appropriately registered with the supplier where this is a requirement. Pennar Industries Ltd is to be the registered owner of all software. Only software obtained in accordance with the getting software policy is to be installed on the business computers.

A software upgrade shall not be installed on a computer that does not already have a copy of the original version of the software loaded on it.

### Software Usage

Only software purchased in accordance with the getting software policy is to be used within the business.

Prior to the use of any software, the employee must receive instructions on any licensing agreements relating to the software, including any restrictions on use of the software.

All employees must receive training for all new software (ERP, P3 etc.). This includes new employees to be trained to use existing software appropriately. This will be the responsibility of Local IT Support.

Employees are prohibited from bringing software from home and loading it onto the business's computer hardware.

Unless express approval from Local IT Support is obtained, software cannot be taken home and loaded on an employees' home computer. Where an employee is required to use software at home, an evaluation of providing the employee with a portable computer should be undertaken in the first instance.

Where it is found that software can be used on the employee's home computer, authorization from Local IT Support is required to purchase separate software if licensing or copyright restrictions apply. Where software is purchased in this circumstance, it remains the property of the business and must be recorded on the software register by Local IT Support.

Unauthorized software is prohibited from being used in the business. This includes the use of software owned by an employee and used within the business.

The unauthorized duplicating, acquiring or use of software copies is prohibited. Any employee whomakes, acquires, or uses unauthorized copies of software will be referred to Local IT Support for taking necessary action.

The illegal duplication of software or other copyrighted works is not conditioned within this business and Local IT Support is authorized to undertake disciplinary action where such event occurs.

## **Breach of Policy**

Where there is a breach of this policy by an employee, that employee will be referred to Local IT Support to undertake disciplinary action where such event occurs.

Where an employee is aware of a breach of the use of software in accordance with this policy, they are obliged to notify Local IT Support immediately.

In the event that the breach is not reported and is determined that an employee failed to report the breach, then that employee will be referred to Local IT Support to undertake disciplinary action where such event occurs.

Any of such breaches will be tracks as incident through out life cycle.

**Policy Manual Issue no :01 changed to Issue no:02 dated on 27-12-2022 which effects from 01-01-2023.**

Status will be reported, and subsequent policy will be addressed with control.

<p>Prepared</p>  <p>IT QA</p>	<p>Issued</p>  <p>Head - IMS</p>	<p>Approved</p>  <p>HEAD, IT</p> <p><b>K. SATYA SRINIVAS</b> Chief Information Officer Pennar Industries Limited</p>
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