

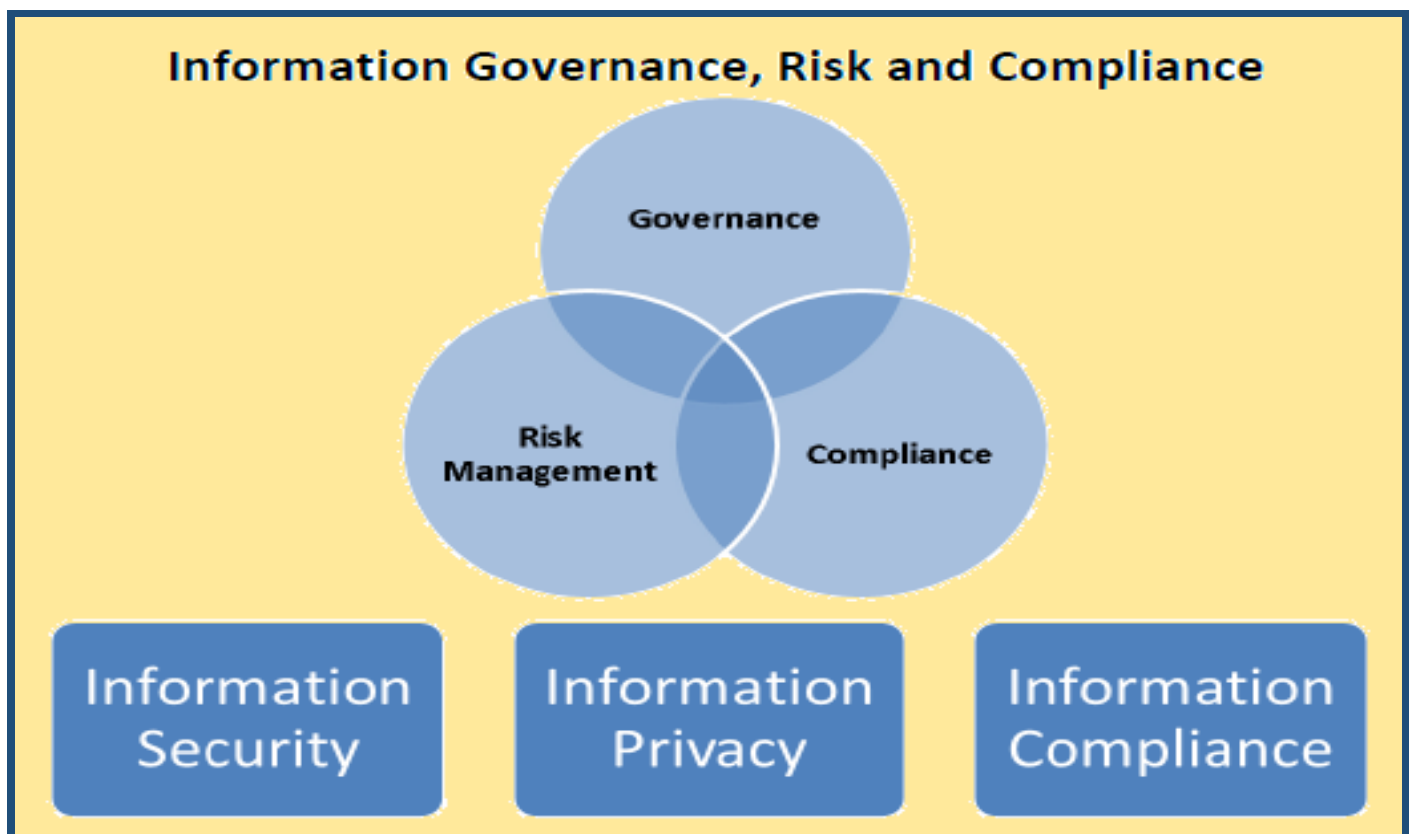
Declaration of Data Protection Policy

Vakrangee Information Security Philosophy is to ensure that **the right data is used by a person in the right role and only in the right context**, so that internal and external customers and other stakeholders can trust us for their business. And, the success of the business depends on the ability to properly protect and make available the systems, applications and data. Vakrangee approach is to develop and maintain its security posture by protecting the sensitive data. To achieve this Vakrangee follow extensive security measures and industry best practices to provide an objective assessment of security domains and programs, including Network security; Infrastructure security – Server, Operating System, Database, Virtualization, Web services; Application security; IT risk assessments, IT gap assessments, Regulatory controls implementation, Data classification, Records management, Database security, Third-party/vendor management, Business continuity management and Incident response.

Vakrangee follow strict security procedures in the storage and disclosure of any information so that its internal and external clients, employees, Board members, other partner in organisation (voluntary or otherwise), contractor or agent shall feel confident about the privacy and security of their personal information.

Vakrangee handle data protection and privacy by categorizing all data based on its sensitivity (confidentiality), criticality (availability), identifiability (privacy) and compliancy, this categorization is then used to determine the safeguards require. Vakrangee controls framework is primarily based upon ISO 27001:2013 which states:

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|-------------------------------|---|
| Information Security | The protection of the confidentiality, integrity and availability of information. |
| Information Privacy | Establishing rules which govern the collection and handling of personal information. |
| Information Compliance | Adherence with all applicable IT regulatory requirements or implementing compensating controls or documenting exception requests. |



Vakrangee implements appropriate information safeguards commensurate with the level of risk. Such safeguards include (but are not limited to):

| Control Objective | Description |
|--|--|
| Access Control | Access to the Organization's non-public information is controlled in accordance with the authorized privileges of the user requesting access. |
| Awareness and Training | Vakrangee provides ongoing security and privacy awareness training to its employee. |
| Audit and Accountability | The information systems maintain a record of system activity by system or application processes and by user activity. |
| Configuration Management | Systems are built and maintained according to a baseline configuration standard which addresses security. |
| Data Governance | The right data is used by a person in the right role and only in the right context. |
| Identification and Authentication | The system verifies that people are who they claim to be. |
| Information Security Management System | Vakrangee establishes, implements, operates, monitors, reviews, maintains and improves information security. |
| Incidence Response | Vakrangee has a defined, repeatable process for managing information security related incidents. |
| Media Protection | Vakrangee protects media throughout its lifecycle. |
| Technology Absorption | Vakrangee has its own technology policy for its acquisition, absorption and adaptation, on long-term as well as short-term basis. We adept Co-development and co-production. |
| Energy Conservation | Vakrangee promote energy conservation while at work. |
| Personnel Security | Vakrangee identifies the security controls needed to properly address how users, designers, implementors, and managers interact with computers and the access and authorities they need to do their job. |
| Physical and Environmental Protection | Vakrangee facilities are protected against physical and environmental threats. |
| Risk Management | Vakrangee continually analyses, responds to, communicates, and manages specific risks to its systems. |
| System and Services Development and Acquisition | Information security and privacy is addressed throughout the development lifecycle. |
| System and Communications Protection | The technical implementation of the system provides a base level of confidence in the technical implementation so that the system's various security functional capabilities can be trusted. |
| System and Information Integrity | Systems and information are protected against unauthorized modification. |
| Compliance | Vakrangee adheres with applicable government body regulations, legal, and contractual requirements. |

Please contact infosec@vakrangee.in or systems@vakrangee.in for any issue regarding Data Privacy Policy.

****Data Protection Policy also available on our website <http://www.vakrangee.in/>**