



Connecting Hearts ....  
Spreading Smiles ....

# SHIVAM INFOCOM PRIVATE LIMITED

AN ISO 9001 & OHSAS 18001 CERTIFIED COMPANY

E-mail : shivam@shivaminfo.in Website : www.shivaminfo.in

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## **COMPANY DATA PROTECTION POLICY**

### **Policy brief & purpose**

Our Company Data Protection Policy refers to our commitment to treating information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect for individual rights.

### **Scope**

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

### **Who is covered under the Data Protection Policy?**

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

## **Policy elements**

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

### **Our data will be:**

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

### **Our data will not be:**

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organizations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data, the company has direct obligations toward people to whom the data belongs. Specifically, we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data

- Allow people to request that we modify, erase, reduce or correct data contained in our databases

## **Actions**

To exercise data protection, we're committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses or communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

Our data protection provisions will appear on our website.

## **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

### **Prepared By**

Piyush Mishra  
HR Head



### **Approved By**

Ashok Sharma  
For Shivam Infocom Pvt. Ltd.  
CFO

  
Authorised Signatory

Shivam infocom Private limited		IT cyber security Process			1   Page
Prepare by		Mr. Dinesh mishra			
Approved by	Checked	Date	Rev	Reference	
Mr. Ashok sharma	yes	10.04.2018	yes	NA	

## IT cyber security committee at Corporate Level

### IT cyber security Committee

We developed own cyber security committee in our organization Name "Shivam cyber security Committee"

In this committee we discuss on our cyber security issues and compliance, new initiative action, field cyber security implementation, awareness about cyber security and action against any violation regarding IT cyber security.

#### Safety Members

Name	Designation	Department
Mr. Ashok sharma	Finance head	Finance
Mr. Yashu khoji	Network Engineer	IT
Mr. Dinesh mishra	IT Manager	IT
Mr. Thangraj	ESH head	ESH
Mr. Anil khan	SCM head	SCM
Mr. Anurag	HR head	HR
Mr. Yatender pachori	Active lead	Active

Council meeting will be held @ Shivam Okhla corporate office on every first week of the month.

where we are discuss following points.

- 1) IT cyber security policy review if require
- 2) Cyber security violation if any
- 3) New join employees awareness compliance
- 4) Monthly system audit report compliance sharing with committee
- 5) Customer legal compliance
- 6) Any other relevant issues



6.2	Encryption Key .....	
6.3	Use of WinZip encrypted and zipped e-mail .....	
6.4	File Transfer Protocol (FTP).....	
8	Telecommuting .....	
8.1	General Requirements .....	
8.2	Required Equipment.....	
8.3	Hardware Security Protections.....	
8.4	Data Security Protection .....	
8.5	Disposal of Paper and/or External Media.....	
9	Specific Protocols and Devices .....	
9.1	Wireless Usage Standards and Policy .....	
9.2	Use of Transportable Media .....	
10	Disposal of External Media / Hardware .....	
10.1	Disposal of External Media .....	
10.2	Requirements Regarding Equipment.....	
10.3	Disposition of Excess Equipment.....	
11	Change Management.....	
12	Audit Controls .....	
13	Information System Activity Review .....	
14	Data Integrity .....	
15	Contingency Plan .....	
	Appendix A – Network Access Request Form.....	
	Appendix B – Asset Undertaking Form.....	
	Appendix C – Approved Software.....	
	Appendix D – Approved Vendors.....	
	Appendix E – Incident Response Tools.....	
	Appendix F – Change Management Tracking Log .....	

Shivam Infocom Pvt Ltd	
<b>Policy and Procedure</b>	
Title: INTRODUCTION	P&P #: IS-1.0
Approval Date:	Review: Annual
Approved By : Ashok Sharma	Information Technology



**NTFS** – New Technology File Systems – NTFS has improved support for metadata and the use of advanced data structures to improve performance, reliability, and disk space utilization plus additional extensions such as security access control lists and file system journaling. The exact specification is a trade secret of Microsoft.

**SOW - Statement of Work** - An agreement between two or more parties that details the working relationship between the parties and lists a body of work to be completed.

**User** - Any person authorized to access an information resource.

**Privileged Users** – system Shivam Infocom Pvt Ltd and others specifically identified and authorized by Practice management.

**Users with edit/update capabilities** – individuals who are permitted, based on job assignment, to add, delete, or change records in a database.

**Users with inquiry (read only) capabilities** – individuals who are prevented, based on job assignment, from adding, deleting, or changing records in a database. Their system access is limited to reading information only.

**VLAN** – Virtual Local Area Network – A logical network, typically created within a network device, usually used to segment network traffic for Shivam Infocom Pvt Ltd, performance and/or security purposes.

**VPN** – Virtual Private Network – Provides a secure passage through the public Internet.

**WAN** – Wide Area Network – A computer network that enables communication across a broad area, i.e. regional, national.

**Virus** - a software program capable of reproducing itself and usually capable of causing great harm to files or other programs on the computer it attacks. A true virus cannot spread to another computer without human assistance.

#### 1.4 CONFIDENTIALITY / SECURITY TEAM (CST)

The Practice has established a Confidentiality / Security Team made up of key personnel whose responsibility it is to identify areas of concern within the Practice and act as the first line of defense in enhancing the appropriate security posture.

All members identified within this policy are assigned to their positions by the JMD. This committee will consist of the positions within the Practice most responsible for the overall security policy planning of the organization- the JMD, Vice President, Senior Manager and CTO. The current members of the CST are:

Name	Department
Dinesh Mishra	IT
Yashu Khoji	IT

The CST will meet quarterly to discuss security issues and to review concerns that arose during the quarter. The CST will identify areas that should be addressed during annual training and review/update security policies as necessary.

The CST will address security issues as they arise and recommend and approve immediate security actions to be undertaken. It is the responsibility of the CST to identify areas of concern within the Practice and act as the first line of defense in enhancing the security posture of the Practice.

The CST is responsible for maintaining a log of security concerns or confidentiality issues. This log must be maintained on a routine basis, and must include the dates of an event, the actions taken to address the event, and recommendations for personnel actions, if appropriate. This log will be reviewed during the quarterly meetings.

