



## INFORMATION SECURITY AND DATA PROTECTION POLICY- ISM 033

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## Introduction

One of ANUSHAM AUTOMOTIVE INDIA PVT LTD' most important assets is the knowledge and information we have developed to deliver products and services to our customers. ANUSHAM AUTOMOTIVE INDIA PVT LTD owns this knowledge, referred to as "proprietary information." Examples of proprietary information include trade secrets, patents, trademarks, copyrights, business research, new product plans, objectives, strategies, customer, or supplier lists, and any unpublished financial or pricing information.

Information may also be classified as "confidential" if ANUSHAM AUTOMOTIVE INDIA PVT LTD wishes to protect it from disclosure to third parties or is obligated to protect it because it was received from a customer or vendor. Employees are required to adhere to the NDA executed at the time of employment with ANUSHAM AUTOMOTIVE INDIA PVT LTD – Need to Check With HR.

Company information must be used for appropriate business purposes only. Disclosing proprietary or confidential information internally and externally must be done with proper safeguards in accordance with applicable laws.

Company information may not be shared with audiences other than those for which it is intended nor may it be used for an employee's own benefit. The proper use and disclosure of confidential information applies to both current and former employees.

## Overview

Confidential information generally consists of non-public information about a person or an entity that, if disclosed, could reasonably be expected to place either that person or the entity at risk of criminal or civil liability or damage the person or entity's financial standing, competitive advantage, business opportunity, employability, privacy or reputation.

ANUSHAM AUTOMOTIVE INDIA PVT LTD is bound by law or contract to protect some types of confidential information, and in other instances, ANUSHAM AUTOMOTIVE INDIA PVT LTD requires protection of confidential information beyond legal or contractual requirements as an additional safeguard. Confidential information can be found in many types of media. For instance, it may reside on ANUSHAM AUTOMOTIVE INDIA PVT LTD computing systems or backup devices, may traverse the networks, be on paper, or be in people's minds.

### Confidential information:

- Payroll records, salary, and non-public benefits information – HR Team

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- Social Security numbers, driver's license numbers, state identification card numbers, passport numbers – HR Team.
- Credit and debit card information, and financial account information relating to ANUSHAM AUTOMOTIVE INDIA PVT LTD or its customers or vendors – Finance Team
- Personnel records, including but not limited to information regarding an employee's work history, credentials, salary and salary grade, benefits, length of service, performance, and discipline HR Team
- Individual background check information HR Team
- Internal investigation information, pre-litigation, non-public litigation, audit, and inquiry information – No Internal audits on Security
- Proprietary or intellectual property, including information about ANUSHAM AUTOMOTIVE INDIA PVT LTD technology, software, and products – License software usage
- Information about ANUSHAM AUTOMOTIVE INDIA PVT LTD business records and planning materials, including customer lists, marketing and sales efforts, and product line plans - HQ Team
- Medical records, personal data, personally identifiable medical information, and all information designated as "Protected Health Information" under the Health Insurance Portability and Accountability Act (HIPAA), or otherwise protected by law - HR & Safety
- All information, materials, data, and records designated confidential by ANUSHAM AUTOMOTIVE INDIA PVT LTD , by law or by contract, including information obtained by ANUSHAM AUTOMOTIVE INDIA PVT LTD from third parties (e.g., ANUSHAM AUTOMOTIVE INDIA PVT LTD customers, potential customers, and vendors) under non-disclosure agreements or any other contract that designates third party information as confidential – IT Team
- Personal data and personally identifiable information about individuals, including information about customers, customers' employees, and ANUSHAM AUTOMOTIVE INDIA PVT LTD personnel
- URLs or customer correspondence that contain session IDs

## **Guidelines and duties**

All employees with job duties that require them to handle confidential information are required to safeguard such information and only use it or disclose it as expressly authorized or specifically required in the course of performing their specific job duties.

Misuse of confidential information can be intentional or a result of negligence or inadvertence, which basically means the misuse is the result of carelessness. Misuse includes but is not limited to:



- Accessing information not directly germane or relevant to the employee's specifically assigned tasks
- Disclosing, discussing, and/or providing confidential information to any individual not authorized to view or access that data, including but not limited to third parties, vendors, and other ANUSHAM AUTOMOTIVE INDIA PVT LTD employees
- Reckless, careless, negligent, or improper handling, storage, or disposal of confidential data, including electronically stored and/or transmitted data, printed documents and reports containing confidential information
- Deleting or altering information without authorization
- Generating and/or disseminating false or misleading information
- Using information viewed or retrieved from the systems for personal or any other unauthorized or unlawful use.

Employees who have been assigned access credentials to work with systems that generate, store, or manage confidential information bear the responsibility for preserving the complete confidentiality of such access credentials to ensure against unauthorized use by any other person. Employees who negligently or

intentionally share their system passwords or accounts with anyone else for any reason will be held responsible for any resulting misuse of the system by others.

Employees who have any reason to believe or suspect that someone else is using their access credentials must immediately notify their supervisor.

Employees are prohibited from logging onto ANUSHAM AUTOMOTIVE INDIA PVT LTD databases and systems with their access credentials and then permitting another person to access information in those databases and/or systems.

### **Employee expectations:**

- Identify confidential information and materials, and ask their supervisor if they are unsure if particular information is confidential
- Proactively seek information regarding and comply with any restrictions on the use, administration, processing, storage, or transfer of the confidential information in any form, physical or electronic
- Learn about and comply with ANUSHAM AUTOMOTIVE INDIA PVT LTD procedures regarding the appropriate handling of such information and materials
- Understand their responsibilities related to information security and privacy
- Complete and acknowledge required data security and privacy training.

Employees who have access to confidential information are expected to know and understand associated security and privacy requirements, and to take measures to protect the information, regardless of the data storage medium being used, e.g. cloud-based storage

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services, printed media (forms, work papers, reports, books), computers, data/voice networks, physical storage environments (offices, filing cabinets, drawers), and magnetic and optical storage media (hard drives, backup drives, mobile devices, CDs, flash drives). Confidential information must always be discarded in a way that will preserve confidentiality (e.g., shred it, and not in a trash can or recycling bin).

ANUSHAM AUTOMOTIVE INDIA PVT LTD requires that a non-disclosure agreement is in place before sharing any ANUSHAM AUTOMOTIVE INDIA PVT LTD confidential information with third parties. Therefore, before discussing or sharing ANUSHAM AUTOMOTIVE INDIA PVT LTD information with third parties, consider whether you may be disclosing ANUSHAM AUTOMOTIVE INDIA PVT LTD confidential information and if so, enter into a non-disclosure agreement in advance

Employees may not use confidential information of former employers or other third parties to perform duties while working for ANUSHAM AUTOMOTIVE INDIA PVT LTD.

Employees must notify ANUSHAM AUTOMOTIVE INDIA PVT LTD of any violation of these guidelines. Employees may report their concerns immediately to ANUSHAM AUTOMOTIVE INDIA PVT LTD' information security.

Employee misuse of confidential information and/or the systems in which the information is stored is a serious breach of job responsibilities and will result in discipline up to and including termination of employment.

## **Physical security**

- Badges must be displayed by all individuals while on ANUSHAM AUTOMOTIVE INDIA PVT LTD maintained premises
- Report lost or stolen badges to ANUSHAM AUTOMOTIVE INDIA PVT LTD Security immediately
- Any access doors observed propped open should be closed then reported to Security
- Ensure guests are properly signed in and badged at reception
- Individuals observed without visible badges should be immediately escorted to reception. Please report any suspicious activity to ISM.

## **Care of Equipment**

You are expected to demonstrate proper care when using the company's property and equipment. No property may be removed from the premises without the proper authorization of management. If you lose, break or damage any property, report it to your manager at once.

## **Clean desk policy**

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In order to reduce the threat of a security incident, employees are required to maintain a clean desk to protect sensitive or critical information about our employees, our company intellectual property, our customers, and our vendors. Employees are required to ensure that all sensitive or confidential materials are removed from their workspace and stored in a secure location when not in use or when an employee leaves his or her workstation for an extended period of time or at the end of the workday. For further information see ANUSHAM AUTOMOTIVE INDIA PVT LTD Clean Desk and Clear Screen Policy.

## **Protecting company information**

Protecting our company's information is the responsibility of every employee, and we all share a common interest in making sure information is not improperly or accidentally disclosed. Do not discuss the company's confidential business with anyone who does not work for us. The HR / Top Management will periodically provide guidance to the nature and scope of company information that may be shared with customers and potential customers.

## **Password policy**

ANUSHAM AUTOMOTIVE INDIA PVT LTD uses a password management system. All employees are required to use this system to store passwords for all ANUSHAM AUTOMOTIVE INDIA PVT LTD related content requiring a password. This includes but is not limited to Business related websites, business related documents (password protected spreadsheets, password protected zip files, etc.). Master Passwords from the password manager shall not be utilized on ANY other system. The re-use of passwords (the same password for multiple websites/accounts) is prohibited. For further information see Password Policy.

- User must change password every 90 days once
- Minimum 12 characters
- Must include uppercase and lowercase letters, numbers, and special characters

## **Data privacy policy**

ANUSHAM AUTOMOTIVE INDIA PVT LTD is committed to ensuring that the private data for which we are responsible is processed in accordance with worldwide data-protection legislation and our commitments to our business partners and employees. In order to fulfil ANUSHAM AUTOMOTIVE INDIA PVT LTD contractual and regulatory obligations, you must be familiar with and adhere to ANUSHAM AUTOMOTIVE INDIA PVT LTD policies for the proper handling of protected data. All employees are expected to follow global privacy laws and honor all rights and freedoms granted individual data subjects with regard to how their personal data is collected, handled, or shared. Failure to protect customer and third-party information may damage relations with customers, suppliers, or others and may result in legal liability.

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## Guidelines

ANUSHAM AUTOMOTIVE INDIA PVT LTD seeks to adhere to the following privacy principles:

- To only collect information that is necessary and relevant to the purpose for which it is being collected
- To maintain information in a secure manner and hold it only for as long as is justifiable and necessary
- To establish data retention periods for collected data and securely dispose of data at the end of its lifecycle
- To utilize practices and technology consistent with industry standards to safeguard the security and privacy of data
- To limit access to only those persons who have a legitimate business need to access the information
- To copy and disseminate information only as necessary to conduct ANUSHAM AUTOMOTIVE INDIA PVT LTD business, perform services in accordance with client agreements or to comply with applicable laws and regulations
- To disclose information to other third parties only after receiving reasonable written assurances regarding the safeguarding of data subject rights and freedoms
- To keep the personal information of its employees and consultants accurate and up-to-date
- To process data lawfully and transparently, presenting notice and obtaining consent, in accordance with applicable law, and to work with clients and partners who follow legally required procedures to notify and obtain consent from their end-customers

For any privacy related questions, please contact the IT Infrastructure and Information Security Manager.

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