



Trackon Canada Private Limited

Compliance Training Program

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1 Policy Statement

1.1 Our Commitment

Reading this policy and our all-staff procedure is required for all new hires. An attestation confirming that the policy and procedure are read and understood is kept as a training record. There are also separate training materials for staff, which include quizzes designed to test the effectiveness of training.

1.2 Purpose

The purpose of the Compliance Policy is to provide direction to design and implement appropriate controls to meet statutory, legal, regulatory, and contractual requirements within the business functions of the Organization. Additionally, this policy aims to ensure compliance of information processing systems with the security policy and standards and minimize interference to business operations from the audit process by appropriate planning.

1.3 Scope

The Compliance Policy applies to all departments that form part of Trackon Canada Pvt Ltd employees, sub-contractors, and partners having access to information systems and assets that are hosted/located in Trackon Canada Pvt Ltd Delivery Centres.



2 Compliance Training Program (*ISO 27001 Control: A.18*)

Trackon Canada Pvt Ltd will develop a compliance training schedule for its employees where employees will be provided pieces of training for the compliance requirements that Trackon Canada Pvt Ltd is legally obligated to.

Training Program:

Following training will be provided to employees (new as well as existing) in a calendar year:

Compliance with legal and contractual requirements including:

- Identification of applicable legislation and contractual requirements
- Intellectual property rights (IPR)
- Protection of records
- Privacy and protection of personally identifiable information
- Regulation of Cryptographic Controls

Information security Compliance includes:

- Information review of information security
- Compliance with security policies and procedures

2.1 Compliance Training for legal and contractual requirements (*ISO 27001 Control: 18.1*)

2.1.1 Training for Identification of applicable legislation and contractual requirements (*ISO 27001 Control: 18.1.1*)

- 1) All relevant statutory, legal, regulatory, and contractual requirements, about the company business including information security requirements, shall be defined explicitly and documented. Track shall ensure compliance with each of the statutory, legal, regulatory, and contractual requirements relevant to its operations.
- 2) Compliance requirements shall be updated timely in case of changes (as applicable) to the relevant and applicable statutory, legal, regulatory, and contractual requirements; and



- 3) Compliance status to the identified requirements shall be conducted periodically by the Compliance Manager and reviewed by IT Security Head along with the IT Security Manager.

2.1.2 Training for Intellectual property rights (IPR) (ISO 27001 Control: 18.1.2)

- 1) Procedures shall be put in place to ensure that terms and conditions and license requirements of the copyrighted software or any other proprietary information used within the Organization are complied with.
- 2) No employee, sub-contractors, or partners shall reproduce any intellectual work violating its copyright.
- 3) Information stored on Trackon Canada Pvt Ltd systems and networks shall remain the property of Trackon Canada Pvt Ltd and all employees, sub-contractors and partners shall be bound by the information security Compliance Policy.
- 4) If a work is copyrighted, explicit written permission to reproduce the work shall be taken from the copyright holder. Copyrighted works include but are not limited to:
 - text (for example: articles), images (for example: photographs), graphics (for example: logos), sound recordings (for example: MP3), video recordings (for example: movies) or software programs.
- 5) The following materials are not considered copyrighted materials:
 - Ideas, facts, process, methods, systems, government works and works in the public domain.
- 6) Intellectual property rights associated with Trackon Canada Pvt Ltd 's information systems shall be recognized and respected and continued compliance with all applicable copyright restrictions and licensing requirements shall be maintained, including:
 - Licensing requirements limit the usage of products, software, system, designs, and other material acquired by Trackon Canada Pvt Ltd.



2.1.3 Training for Protection of records (*ISO 27001 Control: 18.1.3*)

- 1) Protection of Trackon Canada Pvt Ltd 's records is required to ensure Confidentiality, Integrity, and Availability of information that assists the Organization in achieving its purpose and objectives. Records or documents shall be stored, transmitted, updated, and disposed of based on defined procedures.
- 2) All such records shall be securely maintained, in electronic or hard-copy format, as required by legal, regulatory, and industry-specific requirements; and
- 3) Records shall be protected from loss, destruction, and falsification in accordance with business requirements and the requirements of the applicable laws and regulations of the country of operation.

2.1.4 Training for Privacy and protection of personally identifiable information (*ISO 27001 Control: 18.1.4*)

- 1) Identification of sensitive personal or personally identifiable information data shall be performed as per the applicable laws and contractual obligations. This type of information shall be considered 'Confidential' and appropriate access controls shall be implemented.
- 2) Personally, identifiable information shall only be collected and used for business purposes and in line with relevant legislation, regulations, and contractual clauses.
- 3) Personally, identifiable information shall not be shared without due consent of the concerned individual or the approval of the HR Team, except where Trackon Canada Pvt Ltd may be obligated to share such information with law enforcement, government, and regulatory authorities, or to prevent imminent loss or harm to the concerned individual or others; and



- 4) Communications that may include personal or private information such as email, phone calls, and faxes made through Trackon Canada Pvt Ltd systems and networks shall only be recorded and monitored in accordance with defined instructions, and approvals after informing the concerned individuals.

2.1.5 Training for Regulation of Cryptographic Controls (ISO 27001 Control 18.1.5)

- 1) Restrictions on the use of Digital Signatures shall be considered with relevant agreements, laws, and regulations; and
- 2) Legal advice shall be sought to ensure compliance with relevant regulations and legislation.

2.2 Information security Compliance reviews (ISO 27001 Control: 18.2)

2.2.1 Training for Information review of information security (ISO 27001 Control: 18.2.1)

- Tracktion's approach to managing information security and its implementation (i.e., control objectives, controls, policies, processes, and procedures for information security) shall be reviewed independently at planned intervals.
- Audits shall be limited to read-only access to data. Access other than read-only shall only be allowed after proper approval from ISMC / ISWC.
- Where system audits require access to a production system or data or include the use of software tools and utilities, such audits shall be conducted with the knowledge, cooperation, and consent of the owners of the information systems; and
- Relevant precautions shall be taken to protect the information systems and data from damage or disruptions as a result of the audit.



2.2.2 Training for Compliance with security policies and procedures *(ISO 27001 Control: 18.2.2)*

- Compliance with Trackon Canada Pvt Ltd 's ISMS-related policies and procedures is required to ensure that ISMS can achieve its intended purpose and objectives. The functional Head shall ensure that all security procedures within their area of responsibility are carried out correctly to achieve compliance with the information security requirements.
- Any detected non-compliance with the ISMS-related policies and procedures shall be investigated and preventive action shall be taken and reviewed; and
- Such non-compliances as well as their preventive actions shall be further reported at the time of independent reviews.

2.2.3 Training for Technical compliance review *(ISO 27001 Control: 18.2.3)*

- 1) Technical compliance reviews shall be conducted at least annually to ensure that controls have been appropriately implemented; and
 - 2) In case of any non-compliance, a root-cause analysis shall be performed to ascertain the reasons and possible preventive actions for the future.
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