

Solve. Synergise. Surpass.

Compliance Policy

Confidentiality Statement

The policies, procedures and standard practices described in this manual are for the said process only at SG Analytics (from here on termed as 'SGA') and do not extend or imply to any other SGA entity. Information in this document represents guidelines only. SGA reserves the right to modify this document, amend or terminate any policies, procedures, or employee benefit programmes whether or not described in this document at any time, or to require and/or increase contributions toward these programs.

All policies contained herein have been adopted by SGA and supersede previous policies. We periodically review policies, in part or as a whole, to ensure that they continue to reflect current thinking of the organisation and are consistent with trends and legal requirements.

© 2017 SG Analytics Pvt. Ltd. All rights reserved. Property of SG Analytics Pvt. Ltd.

No Part of this document may be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying or recording, for any purpose, without the express written consent of SG Analytics Pvt. Ltd.



Solve. Synergise. Surpass.

Compliance Policy

Document Summary

| Document Reference # | SGA_PO_Compliance Policy_v2.0 |
|-----------------------------|-------------------------------|
| Author | Smitha Saju |
| Reviewed By | Rohit Kalghatgi |
| Approved By | Rohit Kalghatgi |
| Owner | Rohit Kalghatgi |
| Document Type | Policy |
| Document Status | Approved |
| Document Circulation | Confidential Internal |
| Document View Level | Internal |
| Release Date (dd-mm-yyyy) | 12-01-2017 |

SG Analytics

Solve. Synergise. Surpass.

Compliance Policy

Revision History

| Version | Date (DD-MM-YYYY) | Author (Designation: Name) | Changes (Short Description) | Remarks |
|---------|----------------------|-------------------------------|--------------------------------|----------------------|
| v1.0 | 26-07-2016 | Dy. MR Smitha Saju | - | Initial document |
| v2.0 | 12-01-2017 | Dy. MR Smitha Saju | - | Reviewed Document |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Compliance Policy

Content

| 1. | Introd | luction | | | |
|----|--------|---|-----|--|--|
| | | | | | |
| | 1.1 | Objective | . 5 | | |
| | 1.2 | Scope | 5 | | |
| | 1.3 | Glossary of Terms | 5 | | |
| 2. | Respo | onsibility | 5 | | |
| 3. | | Policy | | | |
| | 3.1 | Identification of applicable legislation and contractual requirements | | | |
| | 3.2 | Intellectual property rights | | | |
| | | Protection of records | | | |
| | 3.4 | Privacy and protection of personally identifiable information | 5 | | |
| | 3.5 | Regulation of cryptographic controls | | | |
| 4. | Refer | ence | | | |





1. Introduction

1.1 Objective

This policy is drafted to avoid breaches of legal, statutory, regulatory or contractual obligations related to information security and of any security requirements.

1.2 Scope

This policy shall be applicable to employees, assets, locations of SGA for adherence to all applicable statutory, regulatory, contractual obligations.

1.3 Glossary of Terms

| Terms | Description |
|--------|----------------------------------|
| Dy. MR | Deputy Management Representative |
| MR | Management Representative |
| SGA | SG Analytics Pvt. Ltd. |

2. Responsibility

MR would be responsible for verifying the effectiveness of the process and its revision whenever required.

3. Policy

3.1 Identification of applicable legislation and contractual requirements

- 1. The specific controls and individual responsibilities to meet these requirements shall also be defined and documented in compliance register
- 2. Managers shall identify all legislations applicable to their organization in order to meet the requirements for their type of business. If the organization conducts business in other countries, managers shall consider compliance in all relevant countries

3.2 Intellectual property rights

Appropriate procedures shall be implemented to ensure compliance with legislative, regulatory and contractual requirements related to intellectual property rights and use of proprietary software products.

3.3 Protection of records

Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release, in accordance with legislator, regulatory, contractual and business requirements.

3.4 Privacy and protection of personally identifiable information

Privacy and protection of personally identifiable information shall be ensured as required in relevant legislation and regulation where applicable.

3.5 Regulation of cryptographic controls

Cryptographic controls shall be used in compliance with all relevant agreements, legislation and regulations.

4. Reference

1. ISMS Manual

Solve. Synergise. Surpass.

Compliance Policy

- 2. Internal Audit Procedure
- 3. Compliance Register