# Vardhaman Capital Pvt.Ltd.

## POLICY ON DATA SECURITY

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| **Policy created by** | **Designated Officer** |
| **Policy reviewed by** | **Technology Committee** |
| **Policy reviewed on** | **31-12-2024** |
| **Policy Approved by** | **Board of Directors** |
| **Policy approved on** | **04-01-2025** |

## Version – 1.0

## Purpose

The purpose of this Data Security Policy is to establish guidelines and procedures for protecting the confidentiality, integrity, and availability of data at our Company. This policy aims to mitigate the risk of unauthorized access, disclosure, alteration, and destruction of sensitive financial information.

## Scope

This policy applies to all employees, contractors, third-party vendors, and any other individuals who have access to the stock brokerage firm's data and information systems.

## Policy Guidelines

### Data Classification

- Data will be classified based on its sensitivity and importance to the business.
- Each classification level will have corresponding security controls and access restrictions.

### Access Control

- Access to sensitive data will be restricted based on job responsibilities and the principle of least privilege.
- User access will be reviewed regularly, and adjustments will be made as needed.

### Data Encryption

- Encryption will be applied to sensitive data in transit and at rest.
- Encryption protocols will comply with industry standards.

### Secure Transmission

- Secure communication protocols, such as HTTPS, will be used for transmitting sensitive data over networks.
- Public networks, including the internet, will be avoided for transmitting sensitive information.

### Secure Storage

- Sensitive data will be stored securely in designated repositories with access controls.
- Physical and logical security measures will be implemented to protect data storage facilities.

### Data Backup and Recovery

- Regular backups of critical data will be conducted to ensure data availability in the event of system failures or disasters.
- Backup and recovery procedures will be tested periodically.

### Endpoint Security

- Endpoint security solutions, including antivirus software and endpoint detection and response (EDR) tools, will be deployed and regularly updated.
- Mobile devices used for work purposes will adhere to the same security standards.

### Incident Response Plan

- An incident response plan will be established to promptly address and mitigate security incidents.
- Employees will be trained on reporting security incidents.

### Vendor Security

- Third-party vendors with access to sensitive data will be evaluated for security controls and compliance with data security standards.
- Contracts with vendors will include data security requirements.

## Compliance and Legal Considerations

### Regulatory Compliance

- The data security policy will comply with relevant financial regulations and industry standards.
- Regular audits will be conducted to verify compliance.

### Review and Update

This policy will be reviewed regularly and updated as necessary to address emerging security threats and technological advancements.

## Employee Responsibilities

Employees are responsible for using data in accordance with this policy and reporting any suspicious activities promptly.

## Confidentiality Agreement

Employees will sign a confidentiality agreement, acknowledging their responsibility for protecting sensitive data.

## Training and Awareness

- Employees will undergo regular training on data security best practices.
- Awareness campaigns will be conducted to ensure a culture of security.

**Change in the Policy will be adopted as and when required by the company and is binding on all the Staff / Employees /and Directors of the Company.**

**Vardhaman Capital Pvt.Ltd.**

ANUP KUMAR KHANDELWAL

Digitally signed by ANUP KUMAR KHANDELWAL
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Date: 2025.06.27 15:31:23 +05'30'

**CISO:- Anup Kumar Khandelwal**

**Dated: - 04-01-2025**