

# **INFORMATION SECURITY POLICY**

**For**

## **FINEXO SOLUTIONS PRIVATE LIMITED**

### **1. PURPOSE**

The purpose of this Information Security Policy is to establish the management framework, commitment, and principles necessary to protect Finexo Solutions Private Limited's information assets, including all data processed by the Customer Relationship Management ("CRM") system, ensuring confidentiality, integrity, and availability. This policy supports compliance with applicable regulatory requirements such as Reserve Bank of India ("RBI") Guidelines and the Digital Personal Data Protection Act ("DPDPA").

### **2. SCOPE**

This policy applies to all employees, contractors, consultants, suppliers, and other third parties who have access to, manage, or handle information assets within the organisation's scope, primarily focusing on CRM-related data and systems, but encompassing all organisational information assets.

### **3. MANAGEMENT COMMITMENT**

Top management commits to demonstrating leadership and active involvement in implementing and maintaining an effective Information Security Management System ("ISMS") by:

- 3.1. Establishing this Information Security Policy, ensuring it aligns with the organisation's strategic goals and business objectives.
- 3.2. Integrating information security requirements into organisational processes and decision-making.

- 3.3. Providing sufficient resources (financial, technological, and human) to support ISMS activities and controls.
- 3.4. Communicating the importance of information security and its compliance.
- 3.5. Ensuring that the ISMS achieves its intended outcomes and continually improves through regular monitoring, measurement, analysis, and management reviews.
- 3.6. Supporting roles within the organisation to demonstrate leadership relevant to their ISMS responsibilities.
- 3.7. Promoting a culture of risk awareness and proactive information security management.

#### **4. INFORMATION SECURITY OBJECTIVES**

Information and supporting technology are critical business assets. Increasing reliance on digital systems exposes the organisation to risks including cyber threats, fraud, system failures and data breaches. Security controls shall include administrative, technical and physical safeguards proportionate to identified risks.

Finexo Solutions Private Limited shall establish measurable information security objectives that are consistent with this policy, including but not limited to:

- 4.1. Ensuring the continued availability of CRM systems to support business continuity and customer service.
- 4.2. Meeting or exceeding all applicable legal, regulatory, contractual, and statutory requirements.
- 4.3. Conducting regular risk assessments and implementing appropriate risk treatment controls.
- 4.4. Ensuring all employees and relevant stakeholders are competent and aware of their information security responsibilities.

These objectives shall be documented, communicated to relevant personnel, and reviewed at planned intervals.

## **5. ROLES AND RESPONSIBILITIES**

- 5.1. **Top Management:** Owns the ISMS, approves this policy, ensures resources, reviews ISMS performance, and sets strategic direction.
- 5.2. **Information Security Manager (ISM) (Internal or Outsourced):** Responsible for developing, implementing, monitoring, and maintaining the ISMS, managing risk assessments, incident responses, and compliance audits. Note that function for this role may be fulfilled by a contracted third party.
- 5.3. **Department Heads:** Ensure compliance with policy and facilitate information security awareness and controls within their teams.
- 5.4. **Employees Contractors:** Employees and contractors shall adhere to this policy, report security incidents promptly, safeguard credentials, and participate in security training programs.
- 5.5. Third Parties and Vendors must comply with contractual security obligations imposed by Finexo Solutions Private Limited.

## **6. POLICY ENFORCEMENT**

Compliance with this policy is mandatory for all personnel and relevant third parties. Deviations or violations will be subject to disciplinary action, including legal action where warranted. Transparency and open communication of security matters are encouraged to enable the timely detection and resolution of security issues.

## **7. DOCUMENTATION AND COMMUNICATION**

- 7.1. The policy is documented as official information and is accessible to all employees and relevant external parties as appropriate.
- 7.2. Changes to the policy must be formally approved by top management and documented.

7.3. Training and awareness campaigns will ensure effective communication of the policy's aims and requirements.

## **8. CONTINUAL IMPROVEMENT**

Finexo Solutions Private Limited is committed to the ongoing improvement of the ISMS through:

- 8.1. Monitoring and measurement of security controls and processes.
- 8.2. Internal and external audits to verify compliance effectiveness.
- 8.3. Management reviews that assess performance against objectives and identified risks.
- 8.4. Taking corrective and preventive actions to address nonconformities.

## **9. COMPLIANCE**

This policy ensures adherence to:

- 9.1. RBI and other regulatory guidelines relating to financial and customer data security.
- 9.2. The DPDPA and other applicable data privacy laws.
- 9.3. Contractual obligations related to information security.

## **10. REVIEW**

This policy will be reviewed by top management annually or upon significant organisational or technological changes or changes in applicable law to ensure continued relevance, adequacy, and effectiveness.