

**POLICY ON
INFORMATION TECHNOLOGY
FOR
NEUZEN FINANCE PRIVATE LIMITED
(FORMERLY KNOWN AS UMANG TRADING PVT. LTD.)**

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INFORMATION TECHNOLOGY / INFORMATION SYSTEM POLICY

1. INTRODUCTION

RBI has given guidelines for Information Technology Framework for the NBFC sector ("**Guidelines**"). These Guidelines aim to enhance safety, security, efficiency in processes leading to benefits for NBFCs and their customers. NBFCs, pursuant to these Guidelines, are required to conduct a formal gap analysis between their present status and stipulations as set out in the Guidelines and put in place a time-bound action plan to address the gap.

This IT Framework falls within the scope of Section A of the Guidelines i.e. NBFCs with asset size of above INR 500 crores (Indian Rupees Five Hundred Crores only).

IT governance is an integral part of the corporate governance of Neuzen Finance Private Limited (**NFPL**), and effective IT governance is the responsibility of the board of directors of NFPL ("**Board**") and its executive management.

The Board of Directors ensures implementation of this IT Framework which, *inter alia*, includes (i) Security aspects; (ii) User Role; (iii) Information Security and Cyber Security; (iv) Business Continuity Planning Policy; (v) Back-up Data. For the purpose of effective implementation of this IT Framework, the Board shall ensure technical competence at senior/middle level management of NFPL. The Board of Directors are also responsible for periodic assessment of the IT training requirements to ensure the availability of sufficient, competent and capable human resources in NFPL.

2. SECURITY ASPECTS

a. Password Policy

All users are responsible for keeping their passwords secure and confidential. The password credentials of the users must comply with the password parameters ("**Complexity Requirements**") and standards laid down in this IT Framework. Passwords must not be shared with or made available to anyone in any manner that is not consistent with this IT Framework.

The Complexity Requirements for setting passwords are as follows:

- A strong password must be at least 8 (Eight) characters long.
- It should not contain any of the user's personal information—specifically his/her real name, user name, or even company name.
- It must be very unique from the passwords used previously by the users.
- It should not contain any word spelled completely.
- It should contain characters from the four primary categories i.e. uppercase letters, lowercase letters, numbers, and characters.

- To ensure that a compromised password is not misused on a long-term basis, users are encouraged to change the password every 90 (Ninety) days.
- Passwords must not be stored in readable form in computers without access control systems or in other locations where unauthorized persons might discover them. Passwords must not be written down and left in a place where unauthorized persons might discover them.
- Immediately upon assignment of the initial password and in case of password “reset” situations, the password must be immediately changed by the user to ensure confidentiality of all information.
- Under no circumstances, the users shall use another user’s account or password without proper authorization.
- Under no circumstances, should the user share his/her password(s) with other user(s), unless the said user has obtained from the concerned branch manager/IT head the necessary approval in this regard. In cases where the password(s) is shared in accordance with the above, the user shall be responsible for changing the said password(s) immediately upon the completion of the task for which the password was shared.

b. Access Controls

- Access to the NFPL’s electronic information and information systems, and the facilities where they are housed, is a privilege that may be monitored and revoked without notification. Additionally, all access is governed by law and NFPL policies including but not limited to requirements laid down in this policy.
- Persons or entities with access to the NFPL’s electronic information and information systems are accountable for all activities associated with their user credentials. They are responsible for protecting the confidentiality, integrity, and availability of information collected, processed, transmitted, stored, or transmitted by NFPL, irrespective of the medium on which the information resides.
- Access must be granted on the basis of least privilege - only to resources required by the current role and responsibilities of the person.
- Requirements:
 - a. All users must use a unique ID to access NFPL’s systems and applications.
 - b. Alternative authentication mechanisms that do not rely on a unique ID and password must be formally approved.
 - c. Remote access to NFPL systems and applications must use a two-factor authentication where possible
 - d. System and application sessions must automatically lock after 10 (Ten) minutes of inactivity.

3. INFORMATION SECURITY AND CYBER SECURITY

a. Information Security:

NFPL has an information security framework with the following principles:

- *Identification and classification of information assets:* NFPL maintains detailed inventory of information asset with distinct and clear identification of the asset.
- *Functions:* The information security function is adequately resourced in terms of the number of staff, level of skill and tools or techniques like risk assessment, security architecture, vulnerability assessment, etc. Further, there is a clear segregation of responsibilities relating to system administration, database administration and transaction processing.
- *Role based access control* – Access to information is based on well-defined user roles (system administrator, user manager, application owner.). NFPL has a clear delegation of authority to upgrade/change user profiles and permissions and also key business parameters.
- *Personnel Security* - A few authorized application owners/users may have intimate knowledge of financial institution processes and they pose potential threat to systems and data. NFPL has a process of appropriate checks and balances to avoid any such threat to its systems and data. Personnel with privileged access like system administrator, cyber security personnel, etc are subject to rigorous background check and screening.
- *Physical Security* - The confidentiality, integrity, and availability of information can be impaired through physical access and damage or destruction to physical components. NFPL has created a secured environment for physical security of information assets such as secure location of critical data, restricted access to sensitive areas like data centers etc. and has further obtained adequate insurance to safeguard such data.
- *Maker-checker* – Maker checker is one of the important principles of authorization in the information systems of financial entities. It means that for each transaction, there are at least two individuals necessary for its completion as this will reduce the risk of error and will ensure reliability of information.
- *Trails* - NFPL ensures that audit trails exist for IT assets satisfying its business requirements including regulatory and legal requirements, facilitating audit, serving as forensic evidence when required and assisting in dispute resolution. If an employee, for instance, attempts to access an unauthorized section, this improper activity is recorded in the audit trail.
- *Mobile Financial Services* - NFPL has a mechanism for safeguarding information assets that are used by mobile applications to provide services to customers. The technology used by NFPL for mobile services ensures confidentiality, integrity and authenticity and provides for end-to-end encryption.

- *Digital Signatures* - A Digital signature certificate authenticates entity's identity electronically. NFPL protects the authenticity and integrity of important electronic documents and also for high value fund transfer.
- *Regulatory Returns* – NFPL has adequate system and formats to file regulatory returns to the RBI on a periodic basis. Filing of regulatory returns is managed and verified by the authorized representatives of NFPL.

b. Cyber Security

- NFPL takes effective measures to prevent cyber-attacks and to promptly detect any cyber- intrusions to respond / recover / contain the fall out. Among other things, NFPL takes necessary preventive and corrective measures in addressing various types of cyber threats which includes denial of service, distributed denial of services (DDoS), ransom-ware / crypto ware, destructive malware, business email frauds including spam, email phishing, spear phishing, whaling, vishing frauds, drive-by downloads, browser gateway fraud, ghost administrator exploits, identity frauds, memory update frauds and password related frauds.
- NFPL realizes that managing cyber risk requires the commitment of the entire organization to create a cyber-safe environment. This requires a high level of awareness among staff at all levels. NFPL ensures that the top management and the Board have a fair degree of awareness of the threats. Further, it also proactively promotes, among their customers, vendors, service providers and other relevant stakeholders an understanding of their cyber resilience objectives, and ensures appropriate action to support their synchronized implementation and testing.

c. Confidentiality

- NFPL, along with preservation and protection of the security (as set out in detail above), also ensures confidentiality of customer information in the custody or possession of the service provider.
- Access to customer information by employees of the service provider to NFPL is on 'need to know' basis i.e., limited to those areas where the information is required in order to perform the outsourced function.
- NFPL further ensures that the service provider isolates and clearly identifies NFPL's customer information, documents, records and assets to protect the confidentiality of the information. NFPL has strong safeguards in place so that there is no comingling of information documents, records and assets.
- NFPL ensures that it immediately notifies RBI in the event of any breach of security and leakage of confidential customer related information.

4. BUSINESS CONTINUITY PLANNING (BCP)

- BCP forms a significant part of any organization's overall Business Continuity Management plan, which includes policies, standards and procedures to ensure continuity, resumption and recovery of critical business processes. BCP at NFPL is also designed to minimize the operational, financial, legal, reputational and other material consequences arising from a disaster. NFPL has a Board approved BCP Policy. The functioning of BCP shall be monitored by the Board by way of periodic reports.
- NFPL requires its service providers to develop and establish a robust framework for documenting, maintaining and testing business continuity and recovery procedures. NFPL ensures that the service provider periodically tests the Business Continuity and Recovery Plan and occasionally conducts joint testing and recovery exercises with its service provider.
- In order to mitigate the risk of unexpected termination of the outsourcing agreement or liquidation of the service provider, NFPL retains an appropriate level of control over their outsourcing and the right to intervene with appropriate measures to continue its business operations in such cases without incurring prohibitive expenses and without any break in the operations of NFPL and its services to the customers.
- NFPL ensures that service providers are able to isolate NFPL's information, documents and records and other assets. In appropriate situations, NFPL can remove, all its assets, documents, records of transactions and information given to the service provider, from the possession of the service provider in order to continue its business operations, or delete, destroy or render the same unusable.
- The Board of Director is responsible for formulation, review and monitoring of BCP to ensure continued effectiveness including identifying critical business verticals, locations and shared resources to prepare a detailed business impact analysis.
- After the vulnerabilities and inter relationships between various systems, departments and business processes are identified, there should be a recovery strategy available with the Board of Directors to minimize losses in case of a disaster. NFPL also has the option of alternate service providers and would be able to bring the outsourced activity back in-house in case of an emergency.
- NFPL also has in place necessary backup sites for their critical business systems and Data centers. These plans are also tested by NFPL on a regular basis. The results along with the gap analysis are placed before the Board.

5. BACK-UP OF DATA WITH PERIODIC TESTING

- In order to prevent loss of information by destruction of the magnetic means in which it is stored, a periodic backup procedure is carried out. The responsibility of backing up the information located in shared access servers is the network administrators'.

- Restoration testing on a time-to-time basis is done as both hard disks and magnetic tapes are prone to errors. As a general rule, full backup happens for all critical business applications and a complete weekly full backup is carried out including file servers/old data kept on servers.

6. Policy Review

The Board approves of this IT Framework and has overall charge of the operational functions of NFPL. The Board is further responsible for timely amending this IT Framework pursuant to its operations and/or any change in the regulations or new regulations issued by the RBI in relation to this IT Framework.