# Aldan Investments Pvt Ltd

701 Heritage Plaza, Opp. Indian Oil Nagar, JP Road Andheri (W), Mumbai 400053 CIN: U67120MH1995PTC084811



# Password Policy

# Version 1.0

# 1. Introduction and Purpose

#### 1.1 Introduction

The IT Department at M/s Aldan Investments Private Limited plays a critical role in supporting our stock brokerage operations. This risk management policy outlines our commitment to identifying, assessing, and mitigating risks associated with IT systems, data, and operations. It establishes a framework for managing IT risks and ensuring the security, availability, and integrity of our technology infrastructure.

# 1.2 Purpose The purpose of this policy is to:

- Establish a systematic and proactive approach to identifying, assessing, and managing IT risks within the organization.
- Define roles and responsibilities for managing IT risks.
- Ensure compliance with relevant laws, regulations, and industry best practices.
- Promote a culture of risk awareness, mitigation, and continuous improvement within the IT department.

#### 2. Risk Management Framework

- 2.1 Roles and Responsibilities
- 2.1.1 IT Department
- The IT department is responsible for identifying, assessing, and managing IT risks.
- They will implement and maintain appropriate controls and security measures to mitigate risks effectively.
- The IT department will collaborate with other departments to ensure alignment with the overall risk management framework.

#### 2.1.2 Risk Management Committee

- A dedicated risk management committee, comprising representatives from relevant departments, will oversee the IT risk management process.
- The committee will review and approve risk management strategies, policies, and initiatives.
- They will ensure effective communication and coordination across the organization.

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# 2.2 Risk Assessment Methodology

#### 2.2.1 Risk Identification

- The IT department will conduct regular risk assessments to identify potential risks to IT systems, infrastructure, and data.
- Risks may include cyber threats, data breaches, system failures, unauthorized access, and regulatory non-compliance.
- Risk identification will involve internal analysis, vulnerability assessments, threat intelligence, and industry benchmarks.

# 2.2.2 Risk Analysis and Evaluation

- Identified risks will be analyzed and evaluated based on their potential impact and likelihood of occurrence.
- A risk matrix or other appropriate evaluation method will be used to determine the severity and prioritize risks.
- Risks will be assessed considering their financial, operational, legal, and reputational impacts.

#### 2.3 Risk Mitigation and Controls

#### 2.3.1 Risk Treatment

- The IT department will develop and implement risk treatment plans to mitigate identified risks.
- Treatment options may include risk avoidance, risk transfer, risk reduction, or risk acceptance.
- Controls and safeguards will be implemented to minimize vulnerabilities and mitigate potential impacts.

#### 2.3.2 Security Controls

- The IT department will establish and maintain a robust set of security controls to protect IT systems, networks, and data.
- Controls may include firewalls, intrusion detection systems, antivirus software, access controls, encryption, and regular system patching.
- Security controls will be regularly reviewed, updated, and tested to ensure their effectiveness.

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# 3. Incident Response and Business Continuity

- 3.1 Incident Response
- The IT department will develop an incident response plan to address and manage IT security incidents and breaches promptly.
- The plan will include defined roles and responsibilities, escalation procedures, communication protocols, and post-incident analysis.
- 3.2 Business Continuity and Disaster Recovery
- The IT department will establish and maintain business continuity and disaster recovery plans to ensure the availability and resilience of IT systems and services.
- These plans will include backup procedures, recovery strategies, alternate site arrangements, and periodic testing and drills.

### 4. Training and Awareness

The IT department will provide regular training and awareness programs to employees regarding IT risks, security best practices,