



# RECORD MAINTENANCE AND CONFIDENTIALITY POLICY

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## PART - I

### RECORD MAINTENANCE/ RETENTION POLICY

#### **PURPOSE**

Our Record Retention policy describes our guidelines to create, preserve and access our company's records. To ensure that our records are accurate and secure, we ask our employees to adhere to this policy.

#### **SCOPE**

In this policy, a “**record**” is any type of electronic or paper file (document, spreadsheet, database entries) that we store in our systems. This includes files both employees and external sources create. All legal and business documents, as well as formal internal and external communications, fall under this policy's purview.

This policy applies to employees who may create, access and manage records. The HR and finance departments, which manage sensitive and critical information, are primarily responsible for keeping accurate and secure records. Every other employee who creates and stores important records should follow this policy too.

#### **CREATING RECORDS**

We place high value on our company's records. By storing information, we are able to:

- Make better decisions
- Support our day-to-day operations
- Forecast and prepare for the future
- Learn from past mistakes
- Preserve and defend our company's legality
- Evaluate our operations and employee productivity over time
- Develop plans to improve and grow the company

### **What records do employees need to create?**

Creating and storing certain types of records are mandatory. Employees should keep records that:

- Are mandated by law
- Are necessary for them or other employees to perform their jobs
- Indicate internal or external changes that affect our operations, employees, partners or customers
- Include decisions, reports, data and activities that are important to our business
- Describe business ventures, deals and communication with regulatory bodies or the public
- Employees, teams and departments may keep other records if they decide they're useful to their jobs.

### **General guidelines for creating records.**

Employees should:

- Ensure that information is accurate and complete
- Store records in appropriate mediums
- Name, categorize and share records properly
- Mark appropriate records as confidential
- Clarify who's authorized to access records

## **AUTHORIZATION**

Records may have different levels of authorization that limit their accessibility. The authorization level is usually determined by those who create the records, our company's official policy or the law (the law always take precedence.) The following records are strictly confidential and require a high-level authorization:

- *Employment records*
- *Unpublished financial data*
- *Customer/ vendor/ partner/ job applicant information and contracts*

Access to those records is restricted to employees who directly manage that information. Other types of records, like company performance metrics and internal policies, may be accessible by all permanent employees. Employees must not disclose records to people outside of our company, unless authorized.

## **RETAINING RECORDS**

Our employees must protect our records, whether marked as confidential or not.

## **PHYSICAL RECORDS**

Printed records must be stored safely in filing cabinets or closed offices. Important, confidential files mustn't be left in open office areas.

When employees need to carry physical records out of our offices, they must prevent them from being damaged, lost or stolen. We advise our employees to avoid relocating records as much as possible.

## **ELECTRONIC RECORDS**

Electronic records will be protected by passwords, firewalls and other security settings (both locally and in the cloud.)

Employees are responsible for keeping these records intact. For example, if an employee shares a Google spreadsheet, they must decide whether to give colleagues permission to edit, view or comment. Employees should not grant editing privileges unless necessary.

Also, when employees access electronic, confidential records outside of our offices, they should ensure that both their devices and networks are secure. They should not leave their screens and devices unattended while logged in to our company's accounts.

## **DATA RETENTION PERIOD**

As a general rule, we will keep all records for a minimum of 12 months. The law may oblige us to retain certain records for a longer period. In this case, we'll abide by the law. Also, the following records must be preserved indefinitely:

- *Tax returns*
- *Internal policies*
- *Employment contracts*
- *Partnership and vendor contracts*
- *Financial statements and annual reports*
- *Results of audits and legal investigations*

## **DISCARDING RECORDS**

After the data retention period has passed, authorized employees may choose to discard records for a specific reason. They will usually do this either by shredding physical documents or deleting data from a database or computer. Printed copies of electronic files should be shredded, too.

Records may also be discarded upon request from a stakeholder. For example, a customer or partner may ask us to delete their information from our databases. In this case, managers should authorize employees to discard relevant records.

We expect our employees to always respect our confidentiality policy. When files need to be discarded, employees must not create copies or store information on their devices. This may constitute a security breach and warrant disciplinary action.

## PART - II

### CONFIDENTIALITY POLICY

#### **AIMS & OBJECTIVES**

Employees and personnel of **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** have a duty of maintaining the confidentiality of information received by them in the course of their employment or engagement. This Confidentiality Policy documents the confidentiality and non-disclosure duties and obligations of the employees and personnel of **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED**

The employees and personnel of **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** will, in the course of their employment and engagement, become aware of and possess information of the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** or of third parties disclosed to the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** that is not generally known. This may include information which if disclosed could jeopardize the interests of the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED**. It may also include commercial trade secrets disclosure of which could harm the interests of the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED**.

All employees and personnel of the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** have a duty to keep such information strictly confidential and to use it only for the proper purposes in accordance with the law.

## PURPOSE

The purpose of this Confidentiality Policy is to lay down the principles that must be observed by all who work with the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** and have access to confidential information.

This policy, where relevant, should be read in conjunction with the appointment letter and/or employment contract applicable to **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employees and personnel, and other work rules, policies and procedures applicable to **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employees and personnel.

## CONFIDENTIAL INFORMATION

Confidential information includes any information which is not publicly known. It can concern technology, business, finance, transaction or other affairs of a company. It includes information which is commercially valuable such as trade secrets or business information, as well as personal information.

Examples of confidential information include but are not limited to: any document, discovery, invention, improvement, patent specification, formulations, plans, ideas, books, accounts, data, reports, drafts of documents of all kinds, correspondence, client information, lists and files, decisions, information about employees, strategies, drawings, recommendations, designs, office precedents, policies and procedures, budget and financial information in any form, i.e. physical, electronic, electro-magnetic or otherwise.

Confidential information to do with unpublished inventions can be particularly sensitive. Disclosure of an invention before a patent application is filed will cause irreversible loss of intellectual property rights to the owner of the invention. Even after a patent application is filed, care must be taken not to disclose improvements to the invention. Trade secret protection will also be lost through open disclosure of the

secret.

## PRINCIPLES

**MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** expects all of its employees and personnel to handle all confidential information in a sensitive and professional manner. **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employees and personnel are under an obligation not to gain access or attempt to gain access to information which they are not authorized to have. The **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED**, however, recognizes the importance of an open culture with clear communication and accountability. The **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** wishes to maintain personal and organizational safety and expects all employees and personnel to handle confidential information in a way which protects organizational security.

The purpose of confidentiality is essentially two fold.

- Firstly it protects sensitive or confidential information of the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** and its clients and customers.
- Secondly, in order for the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** to be effective, **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employees and personnel must be able to share information and knowledge, and therefore confidentiality is necessary as a condition of trust.

The best protection against breaches in confidentiality is to keep the number of employees and personnel who have access to sensitive information to a necessary minimum.

Intentional, repeated, accidental, or unauthorized disclosure of any confidential information by any member of staff will be subject to disciplinary action. Any such disciplinary action will take account of the confidential and possible sensitive nature of the information and will make sure that in dealing with it, no further breaches of confidentiality take place.

## **MAINTENANCE OF CONFIDENTIALITY & NON-DISCLOSURE**

**MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employees and personnel:

- must keep confidential all confidential information;
- may use confidential information solely for the purposes of performing their duties as an employee of the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED**; and
- may only disclose confidential information to persons who are aware that the confidential information must be kept confidential and who have a need to know (but only to the extent that each person has a need to know).

The employee's and personnel's obligation of maintaining confidentiality and non-disclosure does not extend to confidential information that is required to be disclosed by the employee pursuant to an order of a Court or any statutory authority. The employee or person will promptly notify the Company of any such requirement to enable the Company to take necessary action as deemed fit by the Company in the circumstances.

At the end of the period of employment, **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employees and personnel must return to the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED**:

- all confidential information in material form;
- those parts of all notes and other records in whatsoever form, based on or incorporating confidential information;
- all copies of confidential information and notes and other records based on or incorporating confidential information; and
- all of **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** property and assets,

in the possession or control of the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employee or personnel.

The obligation of maintaining confidentiality and non-disclosure will continue even



after the end of the period of employment or engagement in respect of all confidential information.

Any employee found to be in breach of this confidentiality and non-disclosure obligation, whilst employed by the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** will be disciplined, and in serious instances, dismissed. Any ex-employee found to be in breach of this confidentiality obligation may be subject to legal action being taken against them, dependent upon the circumstances of the breach, including cancellation/ withdrawal of any or all benefits if extended to the ex-employee by the Company.

This policy will operate in conjunction with the contract of employment or letter of appointment for **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employees and personnel.

## **CIRCUMSTANCES IN WHICH INFORMATION CAN BE DISCLOSED**

Confidential information is only to be disclosed on a "need to know" basis, only when the information is necessary to the employee for performing his or her employment duties effectively. Circumstances in which information can be disclosed:

- With the written consent of his/her reporting superior of not lower than Tier 4 and for a particular purpose.
- If the information is required by or under a Court order or of a statutory authority, the employee or person will promptly notify the Company of any such requirement to enable the Company to take necessary action as deemed fit by the Company in the circumstances.
- Where disclosure can be justified for any other purpose. This is usually for the protection of the public and is likely to be in relation to the prevention and detection of serious crime. A request for information by the police must be carefully considered.

The **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** employee must be able to justify any decision when information has been disclosed.

## **STORAGE OF DATA**

No written document containing confidential information must be left visible where it can be read by anyone. This includes telephone messages, computer prints, letters and other documents. All hardware containing confidential information must be housed in a secure environment. Security precautions must be taken in accordance with the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED** Policy and Procedures.

## **THE MEDIA**

Confidential information must not be passed on to members of the press, or other media communications without the written consent of his reporting superior of not lower than Tier 4 and for a particular purpose. All requests from the media must be dealt with under the **MAGNUM ENVIRONMENT MANAGEMENT PRIVATE LIMITED**'s procedure for handling media queries.

## **DISPOSAL OF INFORMATION**

All media containing confidential information must be disposed off in a manner that ensures that information is not disclosed to an unauthorized person.

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VIJIT RAJ RISHI

DIRECTOR

Praveen Birthare

HR HEAD

Magnum Environment Management Pvt. Ltd.

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