

ACHARYA INSTITUTES

Acharya Dr. Sarvepalli Radhakrishnan Road, Soladevanahalli, Bengaluru -560 107, India



D3. DATA BREACH RESPONSE

Policy N°: AI/IT/DBR/003	Version N°: 002	Owner: Directors	Page 1 of 8
Date of issue: 01 Jun 2020	Review date: 10 Jun 2022	Applicability: All AI Staff & Students	

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1. Objective

The purpose of the policy is to establish the goals and the vision for the breach response process. This policy will clearly define to whom it applies and under what circumstances, and it will include the definition of a breach, staff roles and responsibilities, standards and metrics as well as reporting, remediation, and feedback mechanisms.

2. Scope

This policy applies to all whom collect, access, maintain, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle personally identifiable information of Acharya Institutes' members.

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Policy Drafting & Review Committee	Campus Director Acharya Institutes	Head, Quality Assurance Acharya Institutes

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3. Definitions:

3.1 Encryption or encrypted data – The most effective way to achieve data security. To read an encrypted file, you must have access to a secret key or password that enables you to decrypt it. Unencrypted data is called plain text;

3.2 Plain text – Unencrypted data.

3.3 Hacker – A slang term for a computer enthusiast, i.e., a person who enjoys learning programming languages and computer systems and can often be considered an expert on the subject(s).

3.4 Personally Identifiable Information (PII)

PII is any information about an individual (the data subject) which can

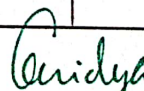
- any information that can be used to distinguish or trace an individual’s identity;
- Any other information that is linked or linkable to an individual Examples included but not limited to: Name, Address, Date of birth etc.

3.5 Sensitive Personal Information (SPI)

Sensitive personal data means personal data consisting of information but not limited to the following attributes of the data subject:

- password;
- financial information such as bank account or credit card or debit card or other payment instrument details;
- physical, physiological and mental health condition;
- sexual orientation;

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- medical records and history;
- genetic or biometric information;
- racial and ethical origin;
- political opinions;
- religious or philosophical beliefs;
- any detail relating to the above clauses as provided to body corporate for providing service; and
- any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise:

Provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

3.6 Data Subject

A data subject who is the subject of personal and sensitive personal data.

3.7 Third Party

All external parties – contractors, interns, summer trainees, vendors – who have access to AI's information assets or information systems.

3.8 Information Resource - The data and information assets of an organization, department or unit.

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3.9 Safeguards - Countermeasures, controls put in place to avoid, detect, counteract, or minimize security risks to physical property, information, computer systems, or other assets. Safeguards help to reduce the risk of damage or loss by stopping, deterring, or slowing down an attack against an asset.

4. Theft, data breach or exposure

As soon as a theft, data breach or exposure containing AI's protected data or AI's Sensitive data is identified, the process of removing all access to that resource will begin.

The Executive Director will chair an incident response team to handle the breach or exposure. The team will include members from:

- Systems dept
- CPRD
- Finance
- Legal
- Human Resources
- The affected unit or department that uses the involved system or output or whose data may have been breached or exposed
- Additional departments based on the data type involved, Additional individuals as deemed necessary by the Executive Director.

The Executive Director will be notified of the theft, breach or exposure. IT, along with the designated forensic team, will analyze the breach or exposure to determine the root cause.

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5. Ownership and Responsibilities

Roles & Responsibilities:

- Sponsors - Sponsors are those members of the A-team that have primary responsibility for maintaining any particular information resource. Sponsors may be designated by any AI's Executive Director in connection with their administrative responsibilities, or by the actual sponsorship, collection, development, or storage of information.
- Systems Administrator is that member of the AI team, who provides administrative support for the implementation, oversight and coordination of security procedures and systems with respect to specific information resources in consultation with the relevant Sponsors.
- Users include virtually all members of the AI team to the extent they have authorized access to information resources, and may include staff, trustees, contractors, consultants, interns, temporary employees, volunteers, students and etc.

6. Enforcement

Any AI's personnel found in violation of this policy shall be subjected to disciplinary action up to and including termination of employment and pursuing of legal action. Any third party partner company/agency found in violation may have their network connection terminated.

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7. Data protection and security

Anyone collecting personal and official information must fairly and lawfully process it, process it only for limited, specifically stated purposes, use the information in a way that is adequate, relevant and not excessive, use the information accurately, keep the information on file no longer than absolutely necessary, process the information in accordance with your legal rights, keep the information secure and never transfer the information outside the country without adequate protection.

Protected and Sensitive data - Data that is encrypted or in plain text and contains PII

8. Data Breach Response Procedures

Any violation of this policy must be reported to CD through concerned HOD immediately.

On receipt of information CD will constitute an investigating committee to do actual enquiry. The Committee which would consist of 3 HODs [including 1 from which the accused employee/ students relate to]. The committee will report its findings and recommendations for disciplinary action to HR/CD.

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