

AL GHURAIR FIRST LLC

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	Ref No.	5939-2022-AGF-Data Classification Policy
	Effective Date	1 November 2022
	Review	To be reviewed every year or as required
	Version No	01

DATA CLASSIFICATION POLICY

AL GHURAIR FIRST LLC

Proposed by:	Mr. Ajeeth Samuel; IT Infrastructure Manager	23 Sep 2022
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SECTION I. POLICY

- 1) No Data to be shared with any party unless there is a clear business requirement supporting the business of the Group.
- 2) All Data and information within the Group should be classified in accordance with its level of confidentiality and distribution authority and be dealt with a high level of responsibility pursuant to its classification.
- 3) All Data should be labeled before distribution in accordance with this Policy.

SECTION II. DEFINITIONS

Unless the text requires otherwise, each of the below terms shall have the meaning set opposite to each of it:

CEO:	The Group Chief Executive Officer
CLCO:	Chief Legal & Compliance Officer
Data/Information:	Shall include all types of information in any format whether verbal, in writing, electronic or physical.
IT Department:	The IT Department of the Group
LCD:	Legal & Compliance Department
The Group	Shall include AL Ghurair First LLC and its subsidiaries and affiliates
Unit:	Shall mean a subsidiary of AL Ghurair First LLC.

SECTION III. Introduction

- 1) Data classification is a process of categorizing and labelling data according to its type, sensitivity, and value to the organization.
- 2) It helps an organization to understand the value of its data, determine whether the data is at risk, and implement controls to mitigate such risks.
- 3) Lack of data classification may lead to sensitive data being compromised and business process owners not taking responsibility for data.

SECTION IV. PURPOSE

- 1) To provide a proper data classification based on the type or category of the documents for the purpose of identifying the permitted level of disclosure or movement of information.
- 2) Implement a data leakage prevention solution to prevent leakage of confidential and sensitive information through emails and other channels
- 3) To mitigate the risk arising from the disclosure and sharing of data within the Company or outside.
- 4) To identify the persons who are authorized to classify data and sharing of data.

SECTION V. PROCESS OF DATA CLASSIFICATION

- 1) Decide data categories and define each category.
- 2) setup labels as per defined category using the tool.



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- 3) Decide on the watermarks and footers to be automatically affixed to documents as per selected labels.
- 4) IT department to configure tools to enforce document labelling and to automatically apply the approved watermarks and footers to documents
- 5) Once the labels are rolled out, every new document should have a label. A document cannot be saved unless it has a label and email cannot be sent without a label.
- 6) Select the target groups for initial roll-out. Department heads to decide.

SECTION VI. DATA CLASSIFICATION – LABELS

- 1) All Data shall be classified in as follows:

Classification Label	Short description	Leakage impact	Circulation control
Restricted	Any information for internal circulation or for restricted external circulation. This type of data will have no to low impact if leaked. Such as company address, names of executives, websites, promotional materials, general terms and conditions.	Low impact	Employee
Confidential	The Information that may be circulated to an authorized person/s. This group may include external business partners. Usually, it requires a written non-disclosure and limited use undertaking from the receiving person before sharing the Information unless it is within the course of business. Such Information includes without limitation; quotations, price lists, customers lists, financial statements, internal policies and procedures, the Group Structure, and all other Information that may be classified as Confidential by the board of directors, CEO, Unit's CEO or heads of departments.	Medium to high impact	Department Head
Classified	Top secret Information that should not to be shared unless express instruction or permission is provided by Board of Directors, Group CEO, or CLCO. Such information may include shareholders' personal details, Group litigations, salaries, bonuses, potential expansions, business plans, budgets, and the Information classified so by owner of the Information.	Very high impact	BOD, CEO, CLCO

- 2) All Information contained either in emails, documents, or electronic formats, or by any mean of communication when communicated should be labeled by the disclosing person in accordance with the above schedule before sharing such Information.



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SECTION VII. APPLICABILITY


- 1) This Policy applies on the Group, all employees shall ensure a proper compliance with the applicable rules and policies.

SECTION VIII. CONTACT AND ACCESS

- 1) Contact: For questions relating to this Policy, please contact the IT Department or LCD at Data_Classification@alghurair.com
- 2) Access: This policy is accessible through: <https://portal.alghurair.com>

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