

# OMAN ELECTRICITY TRANSMISSION COMPANY SAOC.

Member of NAMA Group


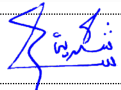

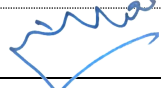
## ISMS Website Privacy Sub Policy

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## Document Information

<b>Document Title</b>	Website Privacy Sub Policy		
<b>Document Reference Number</b>	OETC-ICT-CS-P-001	<b>Revision Number</b>	5.0
<b>Document Technical Review</b>	Cyber Security Team		
<b>Document Classification</b>	Internal		
<b>Review Frequency</b>	1. Once a year or 2. Whenever there is a major change.	<b>Effective Date</b>	22 December 2020

## Document Authorisation

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## Document Revision History

Revision Number	Revision Date	Revision Description
1.0	26 Mar 2014	First issue
1.0	28 May 2015	Periodic Review
2.0	5 June 2016	Security Guideline Changed on: <ul style="list-style-type: none"> <li>Operating System- periodicity of VA been modified</li> <li>Logical Access- Statements updated on user access right</li> <li>E-mail- statements on e-mail server configuration</li> </ul>
2.1	17 Sep 2017	Security Guideline Changed on: <ul style="list-style-type: none"> <li>BYOD- generated</li> <li>IT E-waste – generated</li> </ul>
3.0	30 August 2018	Change document numbering standard <ul style="list-style-type: none"> <li>Data Management &amp; Classification Guideline- Document marking types and retention period of records.</li> <li>Password Guideline- Password history.</li> <li>Add RACI table.</li> <li>Merge the (24) Security Guidelines into One Security Guideline.</li> </ul>
4.0	20 August 2019	Policies have been made as separate documents
5.0	22 December 2020	Review and enhance over all policy and change the policy name to website privacy sub policy.

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## A. Purpose

OETC has a Public facing Website with its own URL [www.omangrid.com](http://www.omangrid.com). The purpose of the website is to inform and update the activities of OETC to public. OETC permits interaction with visitors who may provide personal information on the website. OETC recognized that PII (personally identifiable information) could be sensitive to the concerned individual, hence disclosure of such information require controls to be in place.

The sub policy has been written in accordance with the ISO / IEC 27001:2013 Standard requirements.

## B. Scope

The scope extends to the protection of the privacy & PII information of the people who access the OETC website and the way it is to be protected.

## C. Responsibility for the Sub policy

Role	Responsibility
Top Management	<ul style="list-style-type: none"><li>○ Responsible for providing resources for implementation.</li><li>○ Responsible for approval of policies.</li></ul>
Cybersecurity Section	<ul style="list-style-type: none"><li>○ Responsible for review of sub-policy and providing guidance for implementation.</li></ul>
Cyber Security Governance Committee	<ul style="list-style-type: none"><li>○ Responsible for periodic review, implementation, and monitoring of compliance of the sub policy and reporting to cybersecurity section/ Top Management. (Board of Directors)</li></ul>
Legal	<ul style="list-style-type: none"><li>○ Will ensure that the security guidelines statement meets the local law requirements, and the tone / language is appropriate to the culture of the organization / local civil society.</li></ul>
Third Party representatives	<ul style="list-style-type: none"><li>○ Third party representatives and other users of OETC's information assets are responsible for reading, understanding, and complying with this sub policy.</li></ul>
Senior Application Developer	<ul style="list-style-type: none"><li>○ will be responsible for uploading the sub policy or whenever changes been made.</li><li>○ will be responsible for the PII &amp; other information captured through the web site</li><li>○ responsible for proper capture, classification, and storage of the PII of website visitors</li></ul>
Media	<ul style="list-style-type: none"><li>○ Responsible to update the information requirement as per regulatory or statutory requirements that are enforceable from time to time</li></ul>

## D. Sub policy

- OETC website visitors PII will be protected and their privacy respected.
- Visitor PII collected by the website, will be captured at one source in the form of a database with requisite access controls.
- Only authorized employee OR service provider (with due agreements in place) of OETC will have access to such PII components.
- Access logs will be enabled to monitor the activities on the use of the visitor PII.
- Where the PII must be used, it will confirm to the original stated objective in collecting the information. The PII will not be used by OETC for any other purpose.
- A link will be provided on all the webpages of the OETC website and the link will open to the page with the privacy content informing as above, to enable the visitor to read & understand or download. This

- link will be name as Website Privacy Policy. The page will also have the content provided as “Website usage disclaimer”.
- For creating the awareness of this Website Privacy Policy, On the landing page a semi-transparent banner should also open along with the landing page, where the visitor will have to accept understanding the privacy policy.
  - Disclosure of Personal Information, Privacy sub policy shall secure the personal information of OETC Third party contractors submitted to it, which consists of the information relating to:
    - 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
    - Medical records and history
    - Biometric information
    - Any personally identifiable information (PII) or sensitive personal information (SPI) or Data which violates the terms of agreement with external or internal parties. PII or SPI referred to herein includes but is not limited to information like Passport, National Identity Card etc
    - Any detail relating to this clause as provided to body corporate for providing service; and
    - Any of the information received under this clause by body corporate for processing, stored or processed under lawful contract or otherwise
  - The above-mentioned personal information shall not be shared, or disclosed to any third parties by OETC for commercial considerations.. However, such information may be used only for the following mentioned reasons:
    - OETC may share the information collected with the appropriate authority (in OETC internally or for Third Party) with specific conditions in accordance with this sub policy to verify the veracity of the information.
    - Can be used to respond to writ issued by a government agency, court orders, or in a legal process.
  - OETC provides certain services on the website, which requires explicit agreement to use, such as providing the services of a payment gateway. Before providing access to use the stated services, page should provide for landing on the “Payment gateway usage disclaimer” AND explicit agreement with an accept button. Where the visitor does not accept, further navigation is not to be permitted.

### **Reasonable Security Practices**

- OETC will take reasonable steps to ensure that all dealings in PII Data, shall:
  - be processed fairly & lawfully.
  - any keeping of collection of sensitive personal data or information is only considered necessary for that purpose.
  - be kept secure against unauthorized or unlawful processing and against loss, destruction or damage, as per the prescribed standards on a best effort basis.
- Transfer of Information: OETC shall not transfer the acquired personal information to any other body corporate or a person in any country, unless ensures the "same level of data protection" that is adhered to by it. OETC shall be responsible for any disclosure of information by any other body corporate or a person in any country who received such information from OETC,
- Publication: OETC shall also not publish acquired personal information and shall ensure that the information transferred to a third party is not further disclosed by it.
- Authenticity: OETC shall not be responsible for the authenticity of the PII Data supplied to it by the provider, whose duty it is to ensure that the information provided by it or its employees is authentic.

- Violations of this sub policy may result in disciplinary action, up to and including termination by Human Resource Department where employees are involved or termination of contracts in case of contractors..
- An unauthorized release of confidential information, the Personal Data and information supplied (whether intentional or unintentional) may also result in civil and criminal penalties under applicable laws, rules, and regulations.

## E. Exceptions

All exceptions to this Sub policy shall be explicitly reviewed by the Cyber Security Governance Committee. Exception shall be reassessed and re-approved if necessary.

## F. Enforcement

Breach of the Sub policy provisions shall result in corrective action and shall be reviewed by Cyber Security Governance Committee. Disciplinary action will be consistent with the severity of the incident as determined by an investigation.

## G. Compliance / Non-compliance

The Internal Audit and the Cyber Security Governance Committee shall verify compliance to this sub policy through various methods, including but not limited to periodic walk-throughs, business tool reports, internal and external audits, and feedback to the Sub-Sub policy owner.

An Internal audit shall be carried out based on ISMS-IA annual audit plan and a report shall be submitted to the Cybersecurity Section.

## H. References

Sr. No.	Document Reference
1	ISO / IEC 27001:2013 A.18.1.4 Privacy and protection of personally identifiable information

## I. Definitions and Abbreviations

Term	Definition
PII	Personally, identifiable information (PII) is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous data can be considered PII.
IA	Internal Audit
SPI	sensitive personal information

## J. Documentation

## Annexure 1:

Website Privacy Policy to be published on the website [www.omangrid.com](http://www.omangrid.com) as Website Privacy policy statement. This policy to be published on every webpage on the website. which will contain the phrase “website privacy policy” in the footer portion of the page which will hyperlink to the Website Privacy policy page.

### OETC Website Privacy policy

OETC has hosted a public website [www.omangrid.com](http://www.omangrid.com) that is accessible to the general public as well as its registered users. The purpose of the website is for providing information about its services and certain other value-add-on conveniences.

- When a person accesses the above website, as is the general practices, OETC collects the access information that is not limited to
  1. the system details like IP address, location, etc.
  2. pages and services accessed; transactions performed etc.
  3. user details as provided like but not limited to name, mobile number, email address etc.
  4. uses cookies to store such information on the assessor’s systems for purpose not limited to performance assessment, assessor’s preferences etc.
- The information so gathered is used by OETC for its internal purposes and is committed in securing such information and to protect the assessor’s privacy and safeguarding their personal information that is captured in this process.
- This stated protection abides to the national laws and internal policies of OETC. However, such information may be disclosed under due process of law when requested by statutory authorities, regulators and the like. Such disclosures may have deemed to be made with implied knowledge and consent by the accessors.
- Subject to the above, OETC does not share any such information with third party entities for promotional activities or for commercial reason
- OETC educates all its employees about the importance of confidentiality and customer privacy through its standard policies and procedures. OETC maintains physical, electronic, and procedural safeguards to protect customer information that comply with local laws and regulations.
- While all reasonable safeguards are taken and periodically security is monitored, OETC shall not be responsible or liable for any privacy breaches occurring due to reasons beyond its control.
- A visitor navigating the website is deemed to have knowledge & understanding about OETC privacy policy and is implicit agreement to use of PII information as above.

### Website usage disclaimer

- The information, material, advices, suggestions, illustrations, notifications, announcements, disclosures etc. provided on this website [www.omangrid.com](http://www.omangrid.com) are collectively stated "the content" in this website.
- By accessing this content and any pages/webpages thereof or any of the online services, you agree to be bound by the terms and conditions below. The said content may contain inadvertent mistakes, omissions, inaccuracies, and typographical errors, etc., OETC assumes no responsibility thereof. While efforts shall be made to correct such mistakes or update any other information, OETC is not bound to notify the same to whosoever it may concern.
- OETC makes no warranty or representation regarding any content provided on this website and disclaims all liabilities in respect thereof. Any action taken based on the said content is at your own risk and responsibility. The content on this website is provided for general information only and

does not serve any other purpose. Where used as a basis for making business decisions, the assessor shall use discretion and diligence and shall not hold OETC accountable in any manner whatsoever.

- Any advice or information received via this website should not be relied upon without consulting primary or more accurate or more up-to-date sources of information or specific professional advice. You are recommended to obtain such professional advice where appropriate. All hyperlinks from this website exist as a convenience and for information only and OETC disclaims all responsibility in the use of such information.
- The persons who use this website shall abide by acceptable behaviour and societal ethics with consideration for other users.
- By using this website, the assessor provides implicit consent of the above by browsing through the website.

### **Payment gateway usage disclaimer**

- OETC encourages online and e-payments. In this process OETC makes its best efforts to ensure that the information and the content on the payment site is as accurate as permissible at the time of its publication on the website. However, it does not warrant that this is the case.
- To the fullest extent permitted by law, the material on this website and its online payment facility is provided “as is”, and without warranties, conditions or any other similar terms
- Reasonable endeavours have been made to ensure that the e-Payment service is available and usable at all times, it does not guarantee continuous, uninterrupted or secure access to the system. While every reasonable effort has been made to ensure accessibility, OETC does not guarantee that use of the e-Payment system will be compatible with all hardware and software of its users.
- OETC reserves the right to suspend, withdraw access, without notice to either the whole or part of the payment site for any reason. Nothing on this payment site constitutes any part of a contract unless otherwise explicitly stated