PathwAI

# Access Control Policy

Version 1 - Approved by Abdullah Adeeb

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# 1. Objective

The objective of this policy is to provide a framework to ensure that access to PathwAI Labs assets is provided in a controlled manner based on business and information security requirements.

The framework is designed to ensure that appropriate controls for access management are established to protect PathwAI Labs assets from security threats arising from unauthorized access.

# 2. Scope

This policy applies to specific systems that, from an access standpoint, have significant implications on PathwAI Labs's ability to render its service commitments and safeguard information. These could include but are not limited to infrastructure, network devices, applications, etc that are critical for providing services to its customers.

# 3. Policy Statement

Centralized access control is key to ensuring that the correct PathwAI Labs staff members access the authorized data and systems at the designated level. The principle of least privilege guides PathwAI Labs's access controls. These controls apply to information and information processing systems at the application and operating system layers, including networks and network services.

The confidentiality, integrity, and availability of information stored within the information system of PathwAI Labs shall be assured by ensuring that only authorized users have access to specific information assets as needed for their business activities.

# 4. Access Control Policy

## 4.1 Requirement for Access Control

- Every organization possesses information and information assets that need to be protected from unauthorized use.
- A list of critical systems within PathwAI Labs that host services or sensitive data as defined in the scope of this document shall be identified and documented.
- It is the responsibility of the The Information security officer to ensure all such systems used to meet business requirements at PathwAI Labs are identified, and the list of critical systems is kept updated.

## 4.2 Access Management

### 4.2.1 Access Provisioning

- PathwAI Labs shall provide access privileges to its systems based on the following principles:
    - Need to know – users or resources shall be granted access to systems that are necessary to fulfill their roles and responsibilities.

    - Least privilege – users or resources shall be given minimum privileges necessary to fulfill their roles and responsibilities.
    - Separation of duties – the practice of ensuring responsibility to perform critical actions is distributed among different individuals to keep a single individual from subverting the process.
- The minimum requirements for access control are to be achieved using one or both of the following methodologies:
    - Role-based Access control: This methodology restricts access to systems and resources based on individuals or groups with defined business functions -- e.g., executive level, engineer level 1, etc. -- rather than the identities of individual users.
    - Rule-based access control: This involves a formal registration and de-registration process for individual users where access is provided based on requests and approvals from authorized personnel.
- For Role-based Access Control:
    - Access to information systems and services is restricted based on the role assigned to staff members.
    - The roles that may access each critical system shall be identified and documented.
    - By default, staff members are granted access to systems according to their role or team. The ability to grant access to systems is restricted to the administrators of each system.
    - If any access is required outside the defined role matrix, the business justification for such an event must be documented.
- For Rule-based/Ticket-Based access control:
    - Requests for users' accounts and access privileges must be formally documented and appropriately approved. Access authorization information for a user must be retained for a minimum amount of time as defined in business, contractual, and legal requirements.
    - For any staff member requiring access to systems/platforms/tools, a request needs to be submitted detailing the specific access being requested.
    - The Acceptable Usage Policy needs to be accepted by an employee before being granted access to systems that contain customer data. This policy outlines responsibilities and commitments regarding the acceptable use of PathwAI Labs's assets.
    - If a PathwAI Labs staff member requires access outside of the default for their role or team, either they or their managers may request additional access to the administrators of the respective systems.
    - When granting such access, it shall be limited to the minimum level required to perform the intended business operation.

### 4.2.2 Management of Privileged Access Rights

- PathwAI Labs operates its access management under the principle of least privilege.
- Under the principle of least privilege, a staff member should only be granted the minimum necessary access to perform their function. Access is considered necessary only when a PathwAI Labs staff member cannot perform a function or action without that access. If an action can be performed without the requested access, it's not considered necessary. The

least privilege is important because it protects PathwAI Labs and its customers from unauthorized access and configuration changes and in case of an account compromise by limiting access.

### 4.2.3 Management of Passwords and Secret Authentication Information of Users

- It is recommended to minimize the use of passwords wherever possible. Please follow the guidelines to reduce the reliance on passwords:
    - Use a single-sign-on mechanism to authenticate yourself wherever possible. This avoids the need to create new strong passwords. Please ensure that the password/authentication mechanism for the SSO system is secure.
    - Use multi-factor authentication (MFA) techniques to authenticate yourself wherever possible. This adds an additional barrier even if the password is compromised.
- Where passwords are the only way to log into a system, it is recommended to consider the below security requirements:
    - Staff members must use complex passwords, wherever possible, for all of their accounts that have access to critical data. A strong password should consist of at least 8 characters and should contain a combination of alphanumeric + special characters. It is highly recommended that passwords be at least 12 characters for better security.
    - Passphrases of at least 16 characters are strongly encouraged wherever feasible.
    - It is strongly recommended against the reuse of passwords that are or were used elsewhere, e.g., passwords used for personal accounts. A common way attackers obtain access to corporate resources is by using employees' personal passwords that were obtained in breaches of other services.
    - Passwords shall not be reused for at least the last 10 password cycles to ensure uniqueness.
    - Password change requirements shall be configured in the system. It is recommended to set this duration to 90 days unless MFA is in place, in which case the expiration period can be extended based on the risk assessment.
- PathwAI Labs shall ensure that any password or authentication details stored within systems owned and managed by PathwAI Labs should be encrypted or masked to avoid exposing such details.
- Where applicable, passwords shall be stored securely using industry best practices such as using strong hashing algorithms.
- Employees should never share their passwords with others, even internally, to prevent unauthorized access.
- To safeguard against brute-force attacks, account lockout configurations should be set up. It is recommended to configure account lockout after 5 failed login attempts for a period of 15 minutes and monitor these failed attempts to detect potential unauthorized access.

### 4.2.4 Review of Access Rights

- There shall be a periodic reconciliation of user accounts and the associated rights. The reconciliation needs to be performed at least annually.
- A review of access rights must also include a review of privileges assigned to users.
- It is essential that appropriate actions are taken immediately to remove, disable, or modify any irregularities found in the access reconciliation.

#### 4.2.5 Removal or Adjustment of Access Rights

- Employment termination or change of roles shall trigger relevant processes for revoking or amending access rights.
- If there is a role change, necessary changes/adjustments shall be made so that the user does not have more rights than required to carry out the new job function.
- The removal or modification of access rights for terminated PathwAI Labs employees or contract staff shall be carried out by the relevant administrators.

#### 4.2.6 Secure Log-On Procedures

- The following shall be considered for security when accessing critical systems:
  - If the login is unsuccessful, the error message shall not display which part of the login information was incorrect.
  - Limit the number of unsuccessful log-on attempts.
  - Password shall not be displayed while it is being entered.
  - Multi-factor authentication shall be adopted wherever possible.
  - Using an authentication mechanism like single sign-on (SSO) is also recommended wherever possible.
- **Session Time-Out**
  - Inactive sessions (Application sessions, Administration Sessions, etc.) shall be shut down where feasible after a defined period of inactivity.
  - The intranet site may be exempted from the requirement of session time-out.
  - Session time-out requirements shall be implemented for all the critical systems as feasible and applicable.
  - Re-authentication may be considered at timed intervals.

#### 4.2.7 Access Monitoring

- For all production infrastructure, logging must be enabled to ensure user accountability is maintained in case of any issues. It is recommended to have additional security measures like an intrusion detection/prevention system to detect any unauthorized access.

## 5. Document Security Classification

Company Internal. Please refer to the Data Classification Policy for more details.

## 6. Non-Compliance

Compliance with this policy shall be verified through various methods, including, but not limited to, audits, assessments, and management reviews. Non-compliance with this policy will result in disciplinary action and may lead to termination of employment and/or legal action.

## 7. Responsibilities

The The Information security officer is responsible for the implementation and maintenance of this policy and for ensuring that employees understand their responsibilities. All PathwAI Labs staff

members are expected to comply with this policy and any additional access control measures.

## 8. Schedule

This policy shall be reviewed annually or when there is a significant change in the organization or its business model.

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End of Access Control Policy. For version history, please see the next page.

# Version History

| | Version | Log | Date |
|---|---|---|---|
| 1 | Current | Policy version approved by Abdullah Adeeb | 02 Dec, 2025 |
| 1 | | New policy version created | 02 Dec, 2025 |