

Data Governance Policy

Version: 1.0

Last Updated: October 2025

Approved By: Chief Data Officer (CDO)**

1. Purpose

This policy establishes the framework through which Orbitel.ai manages, protects, and ensures the quality of its data assets.

It supports Orbitel's commitment to responsible data management, transparency, and compliance with privacy and security laws.

2. Scope

Covers all data processed, stored, or transmitted by Orbitel, including:

- Customer and business partner information.
- AI training datasets, metadata, and derived insights.
- Operational and analytical data used across departments.

3. Governance and Responsibilities

- **Chief Data Officer (CDO):** Oversees data governance strategy, policy enforcement, and compliance reporting.
- **Data Governance Committee:** Includes representatives from Engineering, Legal, Privacy, and Product teams.
- **Data Stewards:** Manage data quality, metadata documentation, and classification processes.

4. Policy Principles

a. Data Ownership and Stewardship

- Every dataset has a designated owner responsible for accuracy, completeness, and access control.
- Data classification labels (Public, Internal, Confidential, Restricted) guide protection levels.

b. Data Quality and Integrity

- Data must be accurate, timely, consistent, and validated through automated checks.
- Errors or discrepancies are corrected promptly and logged for audit tracking.

c. Data Lifecycle Management

- Data collection, usage, retention, and deletion follow Orbitel's Privacy and Retention Policies.
- Archival data is anonymized when no longer required for business or legal purposes.

d. Access and Security

- Access to datasets is governed by the Access and Identity Management Policy.
- Sensitive data is encrypted both in transit and at rest.
- Access requests are logged and reviewed periodically.

e. Compliance and Regulatory Alignment

Orbitel's data governance framework aligns with:

- ISO/IEC 38505 (Data Governance Standard).
- GDPR and DPDP 2023 principles of purpose limitation and accountability.
- NIST Privacy Framework for organizational governance.

f. Data Ethics and Responsible Use

- Data is used ethically, respecting user consent, privacy, and intended purpose.
- Automated decisions are subject to human oversight and transparency obligations.

5. Monitoring and Review

Orbitel's Data Governance Committee meets quarterly to review compliance metrics, audit results, and data management KPIs.

This policy is reviewed annually or following significant regulatory or organizational changes.