N&TS GROUP

INFORMATION SECURITY MANAGEMENT SYSTEM POLICY

To give practicality to its commitment to guaranteeing the security of its clients' information, the ISMS Top Management of the company N&TS GROUP Networks & Transactional Systems Group SpA has decided to adopt an Information Security Management System in compliance with the ISO/IEC 27001 standard extended with the controls of the ISO/IEC 27017 and ISO/IEC 27018 standards regarding the design, development, maintenance, electronic payment/collection assistance and provision of the related services in SaaS or Hosting mode (the latter only for 27001) with the intention of continuously satisfying the expressed and implicit needs of the client, pursuing the following objectives:

- keep the risks at acceptable levels by the risk owners, maintaining the risk level at the threshold of 3.5/10 on the Magerit scale;

- ensure annual staff training on information security;

- maintain the ISO/IEC 27001 certification with extension to the ISO/IEC 27017 and ISO/IEC 27018 standards (perimeter: all operational corporate offices);

- complete the migration of the hosted data centers, which house the systems that provide perimeter services, from the old platform to the new one.

The ISMS (ISO/IEC 27001 extended with ISO/IEC 27017 and ISO/IEC 27018) is integrated with the BCMS (ISO 22301),   and with the requirements of the PCI DSS standard and applies to all company functions defined in the organization chart and described in the "Company job description".

All N&TS GROUP personnel and interested parties must contribute to the correct implementation of the Information Security Management System, each within the scope of their role.

In this context, the interested parties, internal and external to N&TS GROUP, are mainly:

1. The internal structure that manages the software applications and services, which includes employees of the Software Factory and Service Factory sectors of the N&TS GROUP operating offices;

2. collaborators who provide services and support within the organization for the activities included in the scope of application;

3. Suppliers (companies and professionals) who provide products and/or services to complete the activities included in the scope of application (including the provision of services through data centers in Italy, Europe and the United States);

4. Clients to which are sold products and final services.

Considering the company operating procedures, collaborators who provide support to the activities included in the scope of application must comply with and apply the same safety rules and indications defined for employees, and are also linked to the procedures established for the management of relations with suppliers.

ISMS Top Management periodically verifies the state of ISMS implementation, effectiveness and adequacy.

Assago, 30-11-2022

TOP MANAGEMENT ISMS: MD Enrico Febelli