

Information Security Policy

Genius Touch B.V.

Registered under the laws of Curacao at Kaya W.F.G. (Jombi) Mensining 24 Unit A, reg.
number 102628750.

Purpose

Information that's collected, analysed, stored, communicated and reported upon may be subject to theft, misuse, loss and corruption. Information may be put at risk by poor education and training, and the breach of security controls.

Information security incidents can give rise to embarrassment, financial loss, non-compliance with standards and legislation, as well as possible judgements being made against Genius Touch B.V. (hereinafter Company)

Objectives

Company's security objectives are that:

- our information risks are identified, managed and treated according to an agreed risk tolerance;
- our authorised information users can securely access and share information in order to perform their roles;
- our physical, procedural and technical controls balance user experience and security;
- our contractual and legal obligations relating to information security are met;
- our teaching, research and administrative activity considers information security;
- individuals accessing our information are aware of their information security responsibilities;
- incidents affecting our information assets are resolved and learnt from to improve our controls.

Scope

The Information Security Policy and its supporting controls, processes and procedures apply to all information used at Company, in all formats. This includes information processed by other organisations in their dealings with Company.

The Information Security Policy and its supporting controls, processes and procedures apply to all individuals who have access to the Company's information and technologies. This includes external parties that provide information processing services to the Company.

Compliance monitoring

Compliance with the controls in this policy will be monitored by the Information Security Team, and reported to the key operation manager.

Review

A review of this policy will be undertaken by the Information Security Team (hereinafter IST or IS Team). This will be annually or as required, and will be approved by the key operation manager.

Policy Statement

It is the Company's policy to ensure that information is protected from a loss of:

- confidentiality – information will be accessible only to authorised individuals;
- integrity – the accuracy and completeness of information will be maintained;
- availability – information will be accessible to authorised users and processes when required.

The Company will take all possible efforts to implement an Information Security Management System or its alternatives based on certified standards as required. The Company will be mindful of the approaches adopted by its stakeholders, including research partners.

The Company will adopt a risk-based approach.

1. Information security policies

A set of lower-level controls, processes and procedures for information security will be defined, in support of this high-level Information Security Policy and its stated objectives. This suite of supporting documentation will be prepared by the IST and approved by the key operational manager, and communicated to The Company's information users, covered by such policies and procedures, and relevant external parties.

2. Organisation of information security

The Company will define and implement suitable governance arrangements for the management of information security. This will include identification and allocation of security responsibilities, to initiate and control the implementation and operation of information security within the Company.

the Company will appoint an:

i) Information Security Team:

- to implement this Information Security Policy, control the adherence to the Information Governance Board and take accountability for information risk
- to influence, oversee and promote the effective management of the Company's information
- to manage the day-to-day information security function

ii) Information Asset Owners (IAOs) to assume local accountability for information management.

3. Human resources security

The Company's security policies and expectations for acceptable use will be communicated to all information users to ensure that they understand their responsibilities.

Where practical, security responsibilities will be included in role descriptions, person specifications and personal development plans.

4. Asset management

All assets will be documented and accounted for. This includes:

- information
- software
- electronic information processing equipment
- service utilities
- people

Owners will be identified for all assets, and they will be responsible for the maintenance and protection of their assets.

All information assets will be classified according to their legal requirements, business value, criticality and sensitivity. Classification will indicate appropriate handling requirements. All information assets will have a defined retention and disposal schedule.

5. Access control

Access to all information will be controlled and will be driven by business requirements. Access will be granted, or arrangements made for users according to their role and the classification of information, only to a level that will allow them to carry out their duties.

A formal user registration and de-registration procedure will be maintained for access to all information systems and services. This will include mandatory authentication methods based on the sensitivity of the information being accessed, and will include consideration of multiple factors as appropriate.

Specific controls will be implemented for users with elevated privileges, to reduce the risk of negligent or deliberate system misuse. The separation of duties will be implemented, where practical.

6. Cryptography

The Company will provide guidance and tools to ensure proper and effective use of cryptography to protect the confidentiality, authenticity and integrity of information and systems.

7. Physical and environmental security

Information processing facilities are housed in secure areas, physically protected from unauthorised access, damage and interference by defined security perimeters. Layered

internal and external security controls will be in place to deter or prevent unauthorised access and protect assets. This includes those that are critical or sensitive, against forcible or hidden attacks.

8. Operations security

The Company will ensure the correct and secure operations of information processing systems. This will include:

- documented operating procedures
- the use of formal change and capacity management
- controls against malware
- defined use of logging
- vulnerability management

9. Communications security

The Company will maintain network security controls to ensure the protection of information within its networks. The Company will also provide the tools and guidance to ensure the secure transfer of information both within its networks and with external entities. This is in line with the classification and handling requirements associated with that information.

10. System acquisition, development and maintenance

Information security requirements will be defined during the development of business requirements for new information systems or changes to existing information systems.

Controls to reduce any risks identified will be implemented where appropriate.

Systems development will be subject to change control and separation of test, development and operational environments.

11. Supplier relationships

The Company's information security requirements will be considered when establishing relationships with suppliers, to ensure that assets accessible to suppliers are protected.

Supplier activity will be monitored and audited according to the value of the assets and the associated risks.

12. Information security incident management

Guidance will be available on what constitutes an information security incident and how this should be reported. Actual or suspected breaches of information security must be reported and will be investigated. The appropriate action to correct the breach will be taken, and any learning built into controls.

13. Information security aspects of business continuity management

The Company will have in place arrangements to protect critical business processes from the effects of major failures of information systems or disasters. This is to ensure their timely recovery in line with documented business needs. This will include appropriate backup routines and built-in resilience.

Business continuity plans must be maintained and tested in support of this policy. Business impact analysis will be undertaken, detailing the consequences of:

- disasters
- security failures
- loss of service
- lack of service availability

14. Compliance

The design, operation, use and management of information systems must comply with all statutory, regulatory and contractual security requirements.

Currently this includes:

- data protection legislation;
- the payment card industry standard (PCI-DSS);
- Company's contractual commitments.

The Company will use a combination of internal and external audits to demonstrate compliance against chosen standards and best practice, including against internal policies and procedures. This will include:

- IT health checks;
- gap analyses against documented standards;
- internal checks on staff compliance;
- returns from Information Asset Owners.

The IST will verify compliance to this Policy through various methods, including but not limited to, periodic walk-thrus, video monitoring, business tool reports, internal and external audits, and feedback to the policy owner.

Any exception to the policy must be approved by the Infosec team in advance.

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

15. Revision History

Date of Change	Responsible	Summary of Change
May 01, 2024	Information Security Team	Initial version 1.0