

Information Security Policy - PlaySmart ENT B.V

Document Type	Policy Document
Document Owner	PlaySmart ENT B.V
Review Frequency	Annually, or when there's changes

Document Control

Business Area	Name	Job Title
Information Security and IT	Tom Finlayson	CTO

Change History

Version	Date	Author	Details
1.0	30/08/2024	Tom Finlayson	Created initial document
	28/01/2025	Tom Finlayson	Revised and updated document

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Introduction

PlaySmart ENT B.V information security policy outlines our guidelines and provisions for preserving the security of our data and technology infrastructure.

The more we rely on technology to collect, store and manage information, the more vulnerable we become to severe security breaches. Human errors, hacker attacks and system malfunctions could cause great financial damage and may jeopardize our company's reputation.

Everyone, from our customers and partners to our employees and contractors, should feel that their data is safe. The only way to gain their trust is to proactively protect our systems and databases. We can all contribute to this by being vigilant and keeping cyber security top of mind.

1.Scope

This policy applies to:

- all staff, including managers and supervisors; full-time, part-time or casual, temporary or permanent staff; job candidates; student placements, apprentices, contractors, subcontractors and volunteers
- how PlaySmart ENT B.V provides services to clients and how it interacts with other members of the public
- all aspects of employment, recruitment and selection; conditions and benefits; training and promotion; task allocation; shifts; hours; leave arrangements; workload; equipment and transport
- on-site, off-site or after-hours work; work-related social functions; conferences – wherever and whenever staff may be as a result of their PlaySmart ENT B.V duties
- staff treatment of other staff, clients, and other members of the public encountered in the course of their PlaySmart ENT B.V duties.

2. Aims

PlaySmart ENT B.V cyber security policy outlines our guidelines and provisions for preserving the security of our data and technology infrastructure.

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3. Policy Elements

3.1 Confidential Data

Confidential data is secret and valuable. Common examples are:

- Unpublished financial information
- Data of customers/partners/vendors
- Patents, formulas or new technologies
- Customer/partner/vendors lists (existing and prospective)

All employees are obliged to protect this data. In this policy, we will give our employees instructions on how to avoid security breaches.

3.2 Protect personal and company devices

When employees use their digital devices to access company emails or accounts, they introduce security risks to our data. We advise our employees to keep both their personal and company-issued computer, tablet and cell phone secure. They can do this if they:

- Keep all devices password protected.
- Choose and upgrade a complete antivirus software.
- Ensure they do not leave their devices exposed or unattended.
- Install security updates of browsers and systems monthly or as soon as updates are available.
- Log into company accounts and systems through secure and private networks only.

We also advise our employees to avoid accessing internal systems and accounts from other people's devices or lending their own devices to others.

When new hires receive company-issued equipment they will receive instructions for:

- Disk encryption setup.
- Password management tool setup.
- Installation of antivirus/ anti-malware software.

They should follow instructions to protect their devices and refer to our CTO if they have any questions.

3.3 Keep emails safe

Emails often host scams and malicious software (e.g. worms.) To avoid virus infection or data theft, we instruct employees to:

- Avoid opening attachments and clicking on links when the content is not adequately explained (e.g. “watch this video, it’s amazing.”)
- Be suspicious of clickbait titles (e.g. offering prizes, advice.)
- Check email and names of people they received a message from to ensure they are legitimate. In case of any doubt, call the person and verify that the email was received from him/her
- Look for inconsistencies or give-aways (e.g. grammar mistakes, capital letters, excessive number of exclamation marks.)

If an employee isn’t sure that an email they received is safe, they can refer to our CTO.

3.4 Manage passwords properly

Password leaks are dangerous since they can compromise our entire infrastructure. Not only should passwords be secure so they won’t be easily hacked, but they should also remain secret. For this reason, we advise our employees to:

- Choose passwords with at least eight characters (including capital and lower-case letters, numbers, and symbols) and avoid information that can be easily guessed (e.g., birthdays.)
- Use 2 Factor Authentication whenever possible
- Remember passwords instead of writing them down. If employees need to write their passwords, they are obliged to keep the paper or digital document confidential and destroy it when their work is done.
- Exchange credentials only when absolutely necessary. When exchanging them in-person isn’t possible, employees should prefer the phone instead of email, and only if they personally recognize the person they are talking to.
- Change their passwords every two months.
- Remembering a large number of passwords can be daunting. We will purchase the services of a password management tool which generates and stores passwords. Employees are obliged to create a secure password for the tool itself, following the above-mentioned advice.

3.5 Transfer data securely

Transferring data introduces a security risk. Employees must:

- Avoid transferring sensitive data (e.g. customer information, employee records) to other devices or accounts unless absolutely necessary. When mass transfer of such data is needed, we request employees to ask our CTO for help.
- All data sent over email (as an attachment or in an email text) should be considered sensitive and protected as such. Never send work documents or information to someone outside of the company unless it has been cleared by a manager and CTO. This includes forwarding company emails to your own personal email.
- Sharing of data through consumer chat system like Skype, should be avoided or in exceptional cases data can be transferred only if encrypted, password must be sent separately and through other systems, like text message.
- Transferring of data to external devices as disks, USB sticks, CD, DVD must be avoided
- Share confidential data over the company network system and not over public Wi-Fi or private connection.
- Ensure that the recipients of the data are properly authorized people or organizations and have adequate security policies.
- Report scams, privacy breaches and hacking attempts
- Our CTO needs to know about scams, breaches, and malware so they can better protect our infrastructure. For this reason, we advise our employees to report perceived attacks, suspicious emails or phishing attempts as soon as possible to our CTO. Our CTO must investigate promptly, resolve the issue, and send a companywide alert when necessary.
- Our CTO is responsible for advising employees on how to detect scam emails. We encourage our employees to reach out to him with any questions or concerns.

3.6 Additional measures

To reduce the likelihood of security breaches, we also instruct our employees to:

- lock their devices when leaving their desks.
- Report stolen or damaged equipment as soon as possible to the CTO.

- Change all account passwords at once when a device is stolen.
- Report a perceived threat or possible security weakness in company systems.
- Refrain from downloading suspicious, unauthorised, or illegal software on their company equipment.
- Avoid accessing suspicious websites.

We also expect our employees to comply with our social media and internet usage policy.

Our CTO should:

- Install firewalls, anti-malware software and access authentication systems.
- Arrange for security training for all employees.
- Inform employees regularly about new scam emails or viruses and ways to combat them.
- Investigate security breaches thoroughly.
- Follow these policies provisions as other employees do.
- Our company will have all physical and digital shields to protect information.

3.7 User Access Control

All the employees will have access to the relevant tools that they require on a daily basis. Other access is limited or not granted at all. When an employee is leaving the company their access is removed on their last working day by System Owners or Admin Users.

The tools include but are not limited to:

- Personal company email address
- Personal company chat tool account
- Player Account Management tool
- Payment Service Provider tool
- Game Provider tools

- Company bank accounts

All the employees are responsible for keeping their personal accounts safe and are not allowed to share passwords with anyone.

User Access Control is recorded [here](#).

3.8 Remote employees

Remote employees must follow this policy's instructions too. Since they will be accessing our company's accounts and systems from a distance, they are obliged to follow all data encryption, protection standards and settings, and ensure their private network is secure. While working remotely it's strongly recommended to use mobile hotspot connection over public Wi-Fi networks.

We encourage them to seek advice from our CTO.

4. Violations of the Policy

If an employee violates this policy, he or she may be subject to termination or other disciplinary action to prevent future violations. The following individuals may be subject to disciplinary action or termination:

- Employees who are in direct violation of this policy.
- Employees who deliberately withhold information concerning the violation of this policy or fail to report a violation of this policy.
- Management personnel who fail to report violation of this policy by their subordinates.

If an employee is accused of violating antitrust laws, yet he or she did consult legal counsel and acted in good faith, the employee may not face disciplinary action under this policy. The Company may also assist in the employee's defence, within the confines of the law.

5. Other relevant PlaySmart ENT B.V policies

Staff is encouraged to read this policy in conjunction with other relevant PlaySmart ENT B.V policies, including:

- AML/CFT manual
- Data Protection Policy
- Privacy Policy

6. More information

If you have a query about this policy or need more information, please contact Tom Finlayson (t.finlayson@playsmart.io).

7. Review details

This policy was last updated on 28th January 2025.