

E-Team Information Security Policy

*IT MANAGED SERVICES PROVIDER ON CUSTOMER "PRIVATE CLOUD"
INFRASTRUCTURES WITH MONITORING H24, SPOC H24, INCIDENT AND PROBLEM
MANAGEMENT, CHANGE MANAGEMENT*

The Top Management of E-Team has drawn up a Information Security Policy through which to provide the services described above, guaranteeing the quality, security and business continuity of information. The strategic direction, principles, basic rules and objectives of this Policy have been defined in order to achieve two primary objectives:

1. Ensure the **protection of its information assets and human resources**, minimizing the risk of damage caused by deliberate or involuntary security incidents from within, from outside or from potential threats;
2. Pursue **continuous improvement** objectives.

Furthermore, through the application of this policy, E-Team intends to comply with the principles and controls established by ISO 27001 and other standards/regulations that govern the business activities in which the company operates, among such as, in particular, laws and regulations regarding privacy and the protection of personal data applicable both in India and in the country where suppliers and customers operate.

Responsibility for the application of this Policy concerns the entire company organization, from the Top Management down to each individual employee. This application takes place in compliance with current laws and provisions, contractual requirements, company rules and procedures.

Protection of information assets

The **protection of the information assets** of E-Team and its customers is placed at the center of the conservative and protection strategies, placing confidentiality, integrity and availability at the center of these strategies, preparing investments aimed at guaranteeing security and protection of the information system, reducing the risk of accidents, minimizing the risk of loss and/or unavailability of customer

data, planning and managing activities to guarantee service continuity. These safety and protection objectives are pursued through:

1. Identification of risks, through a continuous and adequate risk analysis that constantly examines the vulnerabilities and threats associated with the activities to which the system is applied, in order to understand the vulnerabilities and possible threats present in the company that can expose it to risks failure to achieve objectives.
2. Risk management to an acceptable level through the design, implementation, and maintenance of appropriate countermeasures for information security, to ensure the quality of the products and services provided and for the health and safety of the workplace.
3. Protect the confidentiality of information by ensuring that the information is:
 1. accessible only to those authorized to do so;
 2. precise and complete;
 3. available to those who have access rights.
4. Timely and effective actions in response to emerging needs during work activities.
5. Identification of dangers and risks present within the organization.

Furthermore, E-Team, in its strategies for safeguarding information assets, pays the utmost attention to the protection of personal data. The data entrusted to E-Team by customers, suppliers, employees and collaborators are managed in compliance with the laws and regulations applicable to data protection and always with a view to continuous updating according to best practices regarding new technologies. The E-Team's commitment to the protection of personal data is based on principles of: transparency and clarity; legal basis; data minimization; data security; rights of the interested party; training and awareness; limited data retention; vulnerability and penetration testing; external audits; guarantees to customers and suppliers.

The Top Management and the managers of each department are committed to ensuring that the principles outlined above are effectively applied at every step of the production process and in the services that E-Team offers to its Customers, as well as towards its Suppliers and its staff.

Continuous improvement

The **continuous improvement** of E-Team's system is based on involvement, cooperation and collaboration between company resources. This primary objective is pursued through:

1. Periodic review of the Policy, Objectives and implementation of the System.
2. A process vision that takes into consideration the organizational context and management strategies, the planning of objectives, the management of resources, assets, policies and procedures, the criteria for self-assessment and

internal verification of the organization and the stimuli towards such improvement.

3. Attention to the surrounding environment, relying on a preventative approach to problems rather than on subsequent control and related correction, in order to significantly reduce the probability of accidents, injuries or other non-compliances occurring.
4. Training and updating of staff, maintaining high levels of performance, ability to respond to changes and identify new growth opportunities.
5. Involvement of staff, welcoming their contributions and reports, in a working environment open to constructive communication and open to dialogue.
6. Promotion of collaboration, understanding and awareness of the System by strategic suppliers.

This policy is formulated and reviewed by the Top Management of the company. All staff, based on their knowledge, have the responsibility to report any weak point identified in the company systems to the System Manager. This policy is reviewed regularly to identify any changes that affect it and to ensure that it remains suitable for the organization's purposes and the expectations of stakeholders.

Thiruvananthapuram, 18/12/2024

The Top Management

