

## SECURITY POLICY OF INFORMATION

### ISO 27001:2013 Standard

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# 1 CONTEXT

Jakala S.p.A. S.B is an international reality that was born from the union of Jakala Marketing Solutions, specialized in the world of so-called "marketing services", Seri System S.p.A. S.B, a company specialized in the development of personalized marketing strategies, based on loyalty programs and digital strategies in different sectors, Value Lab, an engineering company consulting, analytics and information technology and Volponi S.p.A., an Italian company specialized in integrated communication solutions to support the loyalty activities of the "customer base" (hereinafter also "Jakala").

The diffusion of Jakala all over the world in the field of loyalty, engagement, marketing services advisory, data & analytics and advanced CRM, offers customers support in the strategic, analytical, digital and technological fields for the multi-channel management of institutions, channels and sales force, in order to help them to maximize their sales through the transformation of data into additional revenues.

This core activity is carried out with an integrated model that combines the ability to analyze and interpret data, to develop and integrate engagement platforms and to manage content that can influence the interaction between brands, channels and consumers with a remuneration model also linked to results generated.

In this context, Jakala has in fact a privileged position having in its "portfolio" all the assets necessary to support the competition, with a diversified and integrated know-how, giving rise to a model that is a "unicum" on the market. Given the nature of the activities, particular attention is paid to the security of information, a fundamental factor also to ensure its customers the protection, confidentiality and availability of their information assets.

This policy applies throughout the design and development cycle of Jakala projects, where both technical and organizational measures are taken, according to rules and criteria required by international "best practices" and international reference standards.

# 2 PURPOSE

The purpose of this document is to describe the general principles of information security defined by Jakala in order to develop an efficient and secure Information Security Management System.

# 3 SCOPE OF APPLICATION

Jakala's information security policy applies to all internal staff and third parties who collaborate in the management of information and to all processes and resources involved in the design, implementation, start-up and continuous delivery of services.

## 4 POLITICS

Jakala intends to guarantee the security of the information processed, protecting it from possible threats, internal or external, intentional or accidental, which may compromise its availability, integrity or confidentiality. In addition, it is the primary objective of the organization to ensure the continuity of the services provided.

Information security policies apply to all activities of analysis, design, development and maintenance of products and services, and to the data related to them.

Information security management is based on the following principles:

- assess the level of security of the information managed, in order to be able to establish the appropriate levels of protection to be ensured;
- adopt a risk assessment and management process;
- ensure the implementation of appropriate security measures, at the physical, technological and organizational;
- ensure that incidents affecting information security are promptly recognized and properly managed through efficient prevention, communication and response systems, in order to minimize the impact on the business;
- periodically identify the organization's objectives related to information security, establish plans for their achievement and check their implementation status;
- ensure the adequacy of the Information Security Management System in the event of changes in the internal or external context of the organization;
- ensure staff knowledge of the information security policy and objectives and their contribution to the effectiveness of the system;
- ensure the competence and adequate training of staff;
- ensure the implementation of adequate levels of security by suppliers, partners, etc.;
- continuously monitor and improve the performance and effectiveness of the system;
- ensure compliance with all the laws and regulations applicable to the organization and all the contracts stipulated, and in particular with national and Community legislation on the protection of personal data.

## 5 RESPONSIBILITY FOR INFORMATION SECURITY POLICY

The Chief Information Security Officer is responsible for the secure information management system, in line with the evolution of the business and market context, evaluating any actions to be taken in the face of events such as:

- significant business evolutions;
- new threats compared to those considered in the risk analysis activity;
- significant security incidents;
- evolution of the regulatory or legislative environment regarding the secure processing of information.

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