

Information Security Policy

1 Scope

This policy applies to all INACCESS systems, people and processes, including board members, directors, employees, contractors and other third parties who have access to INACCESS information systems.

2 Policy

INACCESS has adopted the *Information Security Policy* and is committed to the effective implementation and provision of resources for the improvement of the Information Security Management System (ISMS).

- The Information Security Policy aims to ensure:
 - Continuous protection of INACCESS information (including clients' data) against unauthorized access.
 - Continuously ensuring the confidentiality of INACCESS information (including clients' data).
 - Continuously maintaining the integrity of INACCESS information (including clients' data).
 - Continuous assurance of the availability of information and business transactions.
 - Monitoring and compliance with the legislative and regulatory requirements concerning INACCESS.
 - The *Business Continuity Plan* is maintained and tested for its effectiveness.
 - Adequate training of the INACCESS employees in information security issues.
 - Confirmed or suspected information security breaches are reported to the Information Security Officer and are thoroughly investigated and dealt in time and effectively.
- Appropriate procedures and policies, as well as technical and organizational controls, are in place in order to support the Information Security Policy
- Threats, Vulnerabilities, and Risks are continuously monitored and evaluated via the risk assessment process and appropriate resources provided in order to control the risks and minimize the impact on the INACCESS information assets.
- Compliance with the applicable legislation and requirements of ISO 27001: 2013 is ensured and with the ongoing monitoring of the implementation of the ISMS.
- The Information Security Officer is responsible for maintaining the *Information Security Policy* and for providing support and advice in its implementation.
- INACCESS's top management is responsible for the implementation of the *Information Security Policy* as well as for ensuring the compliance of the supervised personnel.
- Compliance with the *Information Security Policy* is mandatory for all parties that have been or are cooperating with INACCESS.
- Any violations of the *Information Security Policy* are subject to disciplinary actions. The decision depends on the nature and impact of the violation.

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Christos Georgopoulos
Chief Executive Officer