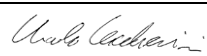
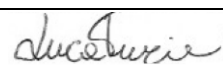


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# INFORMATION SECURITY POLICY


<b>Prepared by:</b>	RSGI Nicolò Ceccherini	
<b>Verified by:</b>	ADS Luca Turini	
<b>Approved by:</b>	CEO Gianluca Cagiano	

COPY N.	ASSIGNED TO		
Controlled distribution	<input checked="" type="checkbox"/> YES		<input checked="" type="checkbox"/> NO
Level	<input type="checkbox"/> A (confidential)	<input type="checkbox"/> M (internal use)	<input checked="" type="checkbox"/> B (public)

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# 1 Applicability

This Information Security Policy applies uniformly to all the company functions. The implementation of this policy is mandatory for all Apparound personnel and must be included within the framework of agreements with any external party that, in any capacity, may come into contact with the information managed within the company.


Apparound allows the communication and spread of information to external parties only for the proper conduct of business activities, which must occur in compliance with applicable rules and regulations.

# 2 Introduction

Apparound is a company primarily operating in the IT industry. Given the nature of its activities, the company considers information security an indispensable factor for protecting its information assets and a strategically valuable aspect that can easily be transformed into a competitive advantage.

In terms of its own activities, Apparound already adheres to relevant regulations concerning data security and intends to provide similar assurances to its clients.

Following this approach, Apparound has decided to implement an Information Security Management System defined according to rules and criteria set by best practices and international standards, in compliance with the guidelines of the international standard ISO/IEC 27001.

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## 3 Objective

The objective of Apparound's Information Security Management System is to protect and safeguard all critical information and information processing resources to ensure the provision of security services and business continuity.


This includes the security and management of electronic devices, information stored on servers, workstations, laptops, network and communication devices, tapes, CDs, removable drives, and printed information, written on paper or transmitted via fax or any other means.

The goal of Apparound's Information Security Management System is to ensure an adequate level of data and information security within the scope of designing, developing, and delivering company services, through the identification, assessment, and treatment of risks to which the services are subject. The Information Security Management System applies to all services offered by the company, particularly:

**PROVISION OF CONSULTING, DESIGN, DEVELOPMENT, AND MAINTENANCE  
SERVICES IN THE INFORMATION AND COMMUNICATION TECHNOLOGY DOMAIN  
WITH SAAS SOLUTIONS**

The Information Security Management System of Apparound defines a set of organizational, technical, and procedural measures to ensure compliance with the following basic information security requirements:

- **Confidentiality**, which is the property of information to be known only to those with privileges;
- **Integrity**, which is the property of information to be modified only by those with privileges;
- **Availability**, which is the property of information to be accessible and usable when required by processes and users who have privileges.


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Through this policy, Apparound also aims to formalize the following objectives in the field of information security:

- Preserve the company's image as a reliable and competent partner;
- Protect its information assets;
- Adopt measures to ensure employee loyalty and professionalization;
- Fully comply with current and applicable data protection regulations (e.g., EU Regulation 679/2016 and subsequent amendments);
- Fully meet the contractual requirements, implicit and explicit, agreed with clients regarding information security;
- Increase the level of awareness and competence of its personnel regarding information security issues.

Apparound's policy requires that:

- Critical information be protected from intentional or unintentional access, use, communication, modification, and disposal;
- Confidentiality, integrity, and availability of such information, whether acquired permanently or in transit, be ensured at all times, as appropriate;
- Any security incidents and policy violations, whether real or suspected, be reported to the Legal Representative (or their delegate), investigated by information security managers, and appropriate treatment actions be taken;
- The Business Continuity Plan be maintained, updated, and tested;
- All legal and contractual requirements regarding information security be met, where applicable;
- The policy be reviewed at periodic intervals to verify its effectiveness, changes in technology, legal and contractual requirements, and business efficiency;
- All managers and functional heads be directly responsible for implementing the policy within their business areas and ensuring compliance by their subordinates.

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## 4 Review

Apparound periodically verifies the effectiveness and efficiency of the Information Security Management System, ensuring adequate support for the adoption of necessary improvements to enable a continuous process that must control the changing conditions or business objectives to ensure proper adaptation.

It is the responsibility of all employees to adhere to this policy, and Management has all rights to recourse in case of its violation in accordance with defined procedures.

Management commits to supporting its implementation and maintaining compliance. This document is communicated to all company personnel.


To facilitate information security, Apparound has identified within its DEV function the role of Information Security Manager, to ensure the Confidentiality, Integrity, and Availability of data.

Therefore, Management invites all personnel to take note of the contents of this Policy and to comply with the standards defined therein.

Pisa, 13/06/2022

The Management



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## 5 Revisions

Rev.	Date	Prepared by	Verified by	Approved by	Reason for revision
00	30/05/2023	RSGI Nicolò Ceccherini	CEO Gianluca Cagiano	CEO Gianluca Cagiano	First official version