

# **GENERAL POLICY FOR INFORMATION SECURITY, CYBERSECURITY AND PRIVACY PROTECTION AT SOFTGROUP AD**

SOFTGROUP AD offers to its customers specific software and hardware products and services implemented through design, development, testing, customization, implementation, validation, warranty, post-warranty support and change control processes of these products and services.

Customers provide the company with various information, which in certain situations may contain sensitive information and personal data.

The accessibility and availability of information is vital to the company's business. Through the implemented information security, cybersecurity and privacy protection management system, appropriately trained personnel, and upgraded IT infrastructure in the company, we maintain a high level of security and protection of information assets owned by SOFTGROUP AD, as well as the information of customers and interested parties.

In order to be able to protect the sensitive information of customers and stakeholders, we implement a number of physical security and access control measures, such as access cards for all employees and visitors and video surveillance of the company's office premises, as well as collocation of servers in a contemporary and well-equipped data centre (in Sofia, Bulgaria) and secure cloud services (Microsoft Azure) for greater security and risk mitigation.

All employees of the company are selected after a very thorough screening process, upon serious competition, constantly developing their professionalism, moral values, and work habits with advanced training and under constant supervision. Each of our employees is bound by contractual obligations of confidentiality with respect to the information they receive as part of their work.

We have specific measures in place to ensure our ongoing legal compliance and compliance with applicable international standards, legal requirements, regulations and directives.

Regarding the implementation of legal requirements for protection of personal data of the company's employees, as well as those of customers and interested parties, we have taken the necessary actions, both at the organizational and technical level, to enable the processing of personal data to be carried out in accordance with the most recent requirements of the legislation in the field of personal data protection in Bulgaria and the European Union.

We strictly comply with the requirements of copyright law and other applicable laws and regulations. The company also ensures appropriate protection of information related to specific commitments

defined in contractual obligations with customers and suppliers and, where necessary, with regulatory authorities in compliance with legal and regulatory requirements.

By putting our customers at the centre of our attention, we are intolerant of risks. At SOFTGROUP AD we manage over 90% of all identified risks, taking the necessary measures to protect the information and ensure its availability, integrity, and confidentiality.

We strive to be one of the best in our business by continuously implementing new technologies in the company's IT infrastructure and security, and improving the information security, cybersecurity and privacy protection management system with new and more efficient protection mechanisms. This is the understanding of our owners and executives. This is the understanding of all of us. This is how we provide security and serenity to all our customers.

This policy provides a framework for developing and achieving information and cybersecurity objectives that are related to the continuous improvement of information security, cybersecurity and privacy protection in our company.

This document is available to all employees of the company and, where appropriate, relevant interested parties.

The implementation of this ISMS policy shall be monitored on an ongoing basis, as well as the related security policies and objectives, which shall be reviewed for completeness and effectiveness annually.

**SOFTGROUP AD reserves the right to change this policy as circumstances require.**

Date	Version	Description	Author
18.10.2024	8.0	General ISMS policy, ver. 8, ENG	Pavlina Gyamcheva

<b>Approved by:</b>	<b>Venelin Dimitrov CEO</b>	<i>Date: 18.10.2024</i>
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