

Information Security Policy

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The Board of Directors and management of Assertis Limited, located at Globe House, Eclipse Park, Sittingbourne Road, Maidstone, Kent, , United Kingdom, ME14 3EN which operates within the rail industry in the business of IT solutions for online ticket retailing are committed to preserving the confidentiality, integrity and availability of all the physical and electronic information assets, including personally identifiable information (PII), throughout the organisation in order to preserve its competitive edge, cash-flow, profitability, legal, regulatory and contractual compliance and commercial image. Information, privacy and information security requirements will continue to be aligned with Assertis Limited's goals, and the information security management system (ISMS) is intended to be an enabling mechanism for information sharing, for electronic operations, for e-commerce and for reducing information- and privacy-related risks to acceptable levels.

The scope of the ISMS includes the management of information security relating to the provision of Software, IT systems and services to the rail industry that combines the people, processes, products and technology tools to meet client requirements using internal resources and third-party services.

This includes:

- All Physical and Information assets owned by Assertis
- Services, training, and support provided to Clients
- Data provided by Clients
- Products and services
- All Staff
- Providers of the data hosting environment utilised by Assertis

The premise within scope it's the office at Globe House, Eclipse Park, Sittingbourne Road, Maidstone, Kent, United Kingdom, ME14 3EN. Where the company uses the services of suppliers, or other third parties, for infrastructure, cloud services, business support or related activities; internally or externally, they are out of scope of the ISMS but these services are managed through ISMS controls and contracts with those parties.

Assertis Limited is committed to ensuring compliance with all applicable legislative, regulatory and contractual requirements, including all applicable PII protection legislation.

Assertis Limited's current strategic business plan and risk management framework provide the context for identifying, assessing, evaluating and controlling information- and privacy-related risks through the establishment and maintenance of an ISMS. The Risk Assessment, Statement of

Applicability and Risk Treatment Plan identify how information- and privacy-related risks are controlled. The Board of Directors is responsible for the management and maintenance of the risk treatment plan. Additional risk assessments may, where necessary, be carried out to determine appropriate controls for specific risks.

In particular, business continuity and contingency plans, data backup procedures, avoidance of viruses and criminal hackers, access control to systems, and information security and privacy incident reporting are fundamental to this policy. Control objectives for each of these areas are supported by specific documented policies and procedures.

Assertis Limited aims to achieve specific, defined information security and privacy objectives, which are developed in accordance with the business objectives, the context of the organisation, the results of risk assessments and the risk treatment plan.

All Employees/Staff of Assertis Limited and certain external parties identified in the ISMS are expected to comply with this policy and with the ISMS that implements this policy. All Employees/Staff, and certain external parties, will receive /be required to provide appropriate training. The consequences of breaching the information security and privacy policies are set out in Assertis Limited's disciplinary policy and in contracts and agreements with third parties.

The ISMS is subject to continuous, systematic review and improvement.

Assertis Limited has established a top level management steering group / Information Security Committee, chaired by the Board of Directors, CTO, Finance Manager, Operations Manager and Customer Services & Social Media Manager to support the ISMS framework and to periodically review the security policy.

Assertis Limited is committed to achieving certification of its ISMS to ISO 27001:2013.

This policy will be reviewed to respond to any changes in the risk assessment or risk treatment plan and at least annually.

In this policy, 'information security' is defined as:

Preserving

This means that management, all full- or part-time Employees/Staff, sub-contractors, project consultants and any external parties have, and will be made aware of, responsibilities (which are defined in their job descriptions or contracts) to preserve information security and privacy, to report security and privacy breaches and to act in accordance with the requirements of the ISMS. All Employees/Staff will receive information security and privacy awareness training, and more specialised Employees/Staff will receive appropriately specialised information and privacy security training.

the confidentiality,

This involves ensuring that information is only accessible to those authorised to access it and therefore preventing both deliberate and accidental unauthorised access to Assertis Limited's information and proprietary knowledge and its systems including its network(s), website(s), extranet(s), and e-commerce systems.

integrity

This involves safeguarding the accuracy and completeness of information and processing methods, and therefore requires preventing deliberate or accidental, partial or complete, destruction or unauthorised modification, of either physical assets or electronic data. There must be appropriate contingency including for network(s), e-commerce system(s), website(s), extranet(s) and data backup plans along with security and privacy incident reporting. Assertis Limited must comply with all relevant data- and privacy-related legislation in those jurisdictions within which it operates.

and availability

This means that information and associated assets should be accessible to authorised Users when required and therefore physically secure. The computer network must be resilient and Assertis Limited must be able to detect and respond rapidly to incidents (such as viruses and other malware) that threaten the continued availability of assets, systems and information. There must be appropriate business continuity plans.

of the physical (assets)

The physical assets of Assertis Limited, including, but not limited to, computer hardware, data cabling, telephone systems, filing systems and physical data files.

and information assets

The information assets include information (whether PII or otherwise) printed or written on paper, transmitted by post or shown in films, or spoken in conversation, as well as information stored electronically on servers, website(s), extranet(s), intranet(s), PCs, laptops, mobile phones and PDAs, as well as on CD ROMs, floppy disks, USB sticks, backup tapes and any other digital or magnetic media, and information transmitted electronically by any means. In this context, 'data' also includes the sets

of instructions that tell the system(s) how to manipulate information (i.e. the software: operating systems, applications, utilities, etc.).

of Assertis Limited.

Assertis Limited and such partners that are part of our integrated network and have signed up to our information security and privacy policy and have accepted our ISMS.

The **ISMS** is the information security management system, of which this policy and other supporting and related documentation are a part, and which has been designed in accordance with the specifications contained in ISO 27001:2013.

A **security breach** is any incident or activity that causes, or may cause, a break down in the confidentiality, integrity or availability of the physical or electronic information assets of Assertis Limited.

A **privacy breach** is any incident or activity that causes, or may cause, a break down in the confidentiality, integrity or availability of the PII assets of Assertis Limited.

Document owner and approval

The Information Security Manager is the owner of this document and is responsible for keeping it up to date.

The current version of this document is available to Board of Directors:

- Alistair Lees
- Barry Shaw

Managers:

- Ana Danescu (Head of Finance)
- Anna Hook (Customer Service & Social Media Manager)
- Marek Mikuliszyn (CTO)
- Katarzyna Popek (Operations Manager)

and is published in ISO27001_Assertis Google Drive, Assertis PeopleHR and present at the Assertis LTD office in Globe House, Eclipse Park, Sittingbourne Road, Maidstone, Kent, United Kingdom, ME14 3EN.

Its approval status can be viewed in the Master List of Document Approval.