

# Information Security Policy

**Corporate Governance & Compliance Policies** 

## X 1. Policy Overview

Swiftfox is committed to protecting the confidentiality, integrity, and availability of all physical and electronic information assets. This policy sets forth the framework for managing and securing information resources.

#### 2. Scope

This policy applies to all employees, contractors, and third-party users of Swiftfox's information systems and services.

#### 3. Information Security Objectives

- Confidentiality: Ensure that information is accessible only to those authorized.
- Integrity: Safeguard the accuracy and completeness of information and processing methods.
- Availability: Ensure that authorized users have access to information when needed.

## 4. Roles and Responsibilities

- All staff must understand their responsibilities in protecting the confidentiality and integrity of the data they handle.
- · Management is responsible for implementing and enforcing these policies.

# 5. Risk Management

Swiftfox will regularly perform risk assessments to identify, quantify, and prioritize risks.

#### 6. Asset Management

All information assets will be accounted for and have a nominated owner. Owners are responsible for the security of their assets.

#### 7. User Access Control

- Access to Swiftfox systems and data will be controlled on the principle of least privilege.
- · User access rights will be reviewed regularly.

## X 8. Physical and Environmental Security

Physical security measures will be implemented to prevent unauthorized access, damage, and interference to the organization's premises and information.

# 9. Operations Security

Procedures and responsibilities for the management of operating systems will be established to ensure secure operations.

#### 10. Communication Security

Protection measures will be applied to networks and information transfer, both internal and external.

# 11. Incident Management

Swiftfox will have in place mechanisms to promptly respond to and manage security incidents.

## 12. Compliance

Swiftfox will comply with all relevant laws, statutes, and regulations.

## 13. Continuous Improvement

Swiftfox is committed to continuously improving information security practices.

# 14. Review and Update

This policy will be reviewed annually or in response to significant organizational or technological changes.