

Information Security Policy

External edition for clients and contractors - aligned with ISO/IEC 27001:2023

1. Purpose

This policy confirms the company's commitment to protecting information entrusted by clients, partners and other interested parties. It declares the use of organisational and technical controls consistent with ISO/IEC 27001:2023 and applicable law, particularly the GDPR.

2. Scope

The policy covers all processes and resources used to handle client information, including correspondence and document management, data registration and digitisation, electronic archiving, external systems and cloud infrastructure. It applies to employees, associates and authorised third parties.

3. General principles

- Client information is processed confidentially, with integrity and availability limited to authorised persons
- Physical, logical and procedural safeguards are applied
- Personal data is processed in accordance with Regulation (EU) 2016/679
- Security incidents are promptly analysed and reported
- External partners operate under data-processing agreements and the security policy
- Access to data and systems is controlled, monitored and periodically reviewed
- Backups are securely stored and recovery is tested

4. Information Security Management System

The company maintains an ISMS aligned with ISO/IEC 27001:2023. It includes risk assessment and mitigation, security objectives, audits, management reviews, corrective and preventive actions, and staff awareness training.

5. Responsibilities

Everyone acting for or on behalf of the company must comply with this policy. Oversight is exercised by the designated information security team in accordance with internal ISMS documentation.

6. Contact

Questions about data processing, assigned permissions or incident reporting may be directed to the information security contact stated in the contract or on the company website.

7. Final provisions

This external policy may be shared as evidence of the company's systematic approach to information protection and international security standards. It is reviewed at least annually.

Informational translation. In the event of any discrepancy, the Polish original prevails.