Information security policy

In a technological environment where the convergence between computing and communications is facilitating a new paradigm of productivity for companies, it is very important that users of the corporate information system have a guide of good practices to achieve the objectives of confidentiality, integrity, availability and legality of all the information managed.

- Confidentiality: The information processed by PECUNPAY will be known only to authorised persons, after identification, at the time and by the means provided.
- Integrity: The Information processed by PECUNPAY shall be complete, accurate and valid.
- Availability: The information processed by PECUNPAY will be accessible and used by authorised and identified users at all times, and its permanence is guaranteed in case of any eventuality.
- Authenticity: The information processed by PECUNPAY will guarantee the authenticity of transactions and communications, which means that an entity is who it claims to be or that it guarantees the source of the data.
- Traceability: The information processed by PECUNPAY will have the property or characteristic that the actions can be attributed exclusively to that entity.
- Legality: PECUNPAY will guarantee compliance with all applicable legislation, including the following:

- Law 10/2010, of the 28th of April, on the prevention of money laundering and the financing of terrorism, and its development regulations.

- Organic Law 3/2018, of the 5th of December, on the Protection of Personal Data and guarantee of digital rights.

- General Data Protection Regulation (EU) 2016/679.

- Royal Decree Law 19/2018 on payment services and other urgent measures in financial matters.

- Law 7/1998, of the 13th of April, on general contracting conditions.

- Law 34/2002, of the 11th of July, on information society services and electronic commerce.

- Royal Legislative Decree 1/2007, of the 16th of November, approving the revised text of the General Law for the Defence of Consumers and Users and other complementary laws.

- Law 21/2011, of the 26th of July, on electronic money.

- Royal Decree 778/2012, of the 4th of May, on the legal framework of electronic money institutions.

The General Management of PECUNPAY assumes responsibility for supporting and promoting the establishment of the organisational, technical and control measures necessary for compliance with the security guidelines described herein. Consequently, PECUNPAY has defined a set of internal rules that all users of the information system must comply with and has designated the following roles:

- Information security manager, whose main functions include two of the following:

- Ensuring that the information security management system complies with the requirements of this international standard.

- Report to senior management on the performance of the information security management system.

- Data Protection Delegate, whose main functions include:

- Informing and advising the controller or processor and the employees in charge of the processing of the obligations incumbent upon them in compliance with the regulations in force on the protection of personal data;

- Monitor compliance with the provisions of the applicable personal data protection laws and the controller's or processor's policies on the protection of personal data, including the allocation of responsibilities, awareness-raising and training of staff involved in processing operations, and related audits;

- Providing advice on the data protection impact assessment and monitoring its implementation, as requested.

- Cooperate with the control authority;

- Act as a contact point for the control authority on issues relating to processing, including prior consultation as referred to in Article 36, and consult, as appropriate, on any other matter.

This Security Policy shall be kept, updated and fit for purpose, aligned with the organisation's strategic risk management context. To this end, it shall be reviewed at planned intervals or whenever significant changes occur to ensure that its suitability, adequacy and effectiveness are maintained. Furthermore, in order to manage the risks faced by PECUNPAY, a formally defined risk assessment procedure is established.

CEO