

Information security policy	Editorial	1
	Page	1 3 7

POLITICS
INFORMATION SECURITY
SMARTNOVA LIMITED

Information security policy	Editorial	1
	Page	2 3 7

1. Overview

Smartnova Limited (hereinafter “**Smartnova**”) is committed to protecting Smartnova's employees, partners and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, mobile devices, software, operating systems, storage media, network accounts providing electronic mail, WWW browsing, and FTP, are the property of Smartnova. These systems are to be used for business purposes in serving the interests of the company, and of our clients and customers during normal operations.

Effective security is a team effort involving the participation and support of every Smartnova employee and affiliate who deals with information and/or information systems. It is the responsibility of every computer user to know these guidelines, and to conduct their activities accordingly.

2. Purpose

The purpose of this policy is to outline the acceptable use of computer equipment and other electronic devices at Smartnova. These rules are in place to protect the employee and Smartnova. Inappropriate use exposes Smartnova to cyber risks including virus attacks including ransomware, compromise of network systems and services, data breach, and legal issues.

3. Scope

This policy applies to the use of information, electronic and computing devices, and network resources to conduct Smartnova business or interact with internal networks and business systems, whether owned or leased by Smartnova, the employee, or a third party. All employees, contractors, consultants, temporary, and other workers at Smartnova and its subsidiaries are responsible for exercising good judgment regarding appropriate use of information, electronic devices, and network resources in accordance with Smartnova policies and standards, and local laws and regulation.

This policy applies to employees, contractors, consultants, temporaries, and other workers at Smartnova, including all personnel affiliated with third parties. This policy applies to all equipment that is owned or leased by Smartnova.

4. Policy

Information security policy	Editorial	1
	Page	3 3 7

4.1 General Use and Ownership

- 4.1.1 Smartnova proprietary information stored on electronic and computing devices whether owned or leased by Smartnova, the employee or a third party, remains the sole property of Smartnova. You must ensure through legal or technical means that proprietary information is protected in accordance with the Data Protection Standard.
- 4.1.2 You have a responsibility to promptly report the theft, loss, or unauthorized disclosure of Smartnova proprietary information.
- 4.1.3 You may access, use or share Smartnova proprietary information only to the extent it is authorized and necessary to fulfill your assigned job duties.
- 4.1.4 Employees are responsible for exercising good judgment regarding the reasonableness of personal use. Individual departments are responsible for creating guidelines concerning personal use of Internet/Intranet/Extranet systems. In the absence of such policies, employees should be guided by departmental policies on personal use, and if there is any uncertainty, employees should consult their supervisor or manager.
- 4.1.5 For security and network maintenance purposes, authorized individuals within Smartnova may monitor equipment, systems, and network traffic at any time.

4.2 Security and Proprietary Information

- 4.2.1 All mobile and computing devices that connect to the internal network must comply with the Minimum Access Policy.
- 4.2.2 System level and user level passwords must comply with the Password Policy. Providing access to another individual, either deliberately or through failure to secure its access, is prohibited.
- 4.2.3 All computing devices must be secured with a password-protected lock screen with the automatic activation feature set to 10 minutes or less. You must lock the screen or log off when the device is unattended.
- 4.2.4 Employees must use extreme caution when opening email attachments received from unknown senders, which may contain malware.

4.3 Unacceptable Use

The following activities are, in general, prohibited. Employees may be exempted from these restrictions during their legitimate job responsibilities (e.g., systems administration staff may have a need to disable the network access of a host if that host is disrupting production services).

Under no circumstances is an employee of Smartnova authorized to engage in any activity that is illegal under local, state, federal or international law while utilizing Smartnova-owned resources.

Information security policy	Editorial	1
	Page	4 3 7

The lists below are by no means exhaustive but attempt to provide a framework for activities which fall into the category of unacceptable use.

4.3.1 System and Network Activities

The following activities are strictly prohibited, with no exceptions:

1. Violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property, or similar laws or regulations, including, but not limited to, the installation or distribution of "pirated" or other software products that are not appropriately licensed for use by Smartnova.
2. Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books or other copyrighted sources, copyrighted music, and the installation of any copyrighted software for which Smartnova or the end user does not have an active license is strictly prohibited.
3. Accessing data, a server, or an account for any purpose other than conducting Smartnova business, even if you have authorized access, is prohibited.
4. Exporting software, technical information, encryption software or technology, in violation of international or regional export control laws, is illegal. The appropriate management should be consulted prior to export of any material that is in question.
5. Introduction of malicious programs into the network or server (e.g., viruses, worms, trojan horses, ransomware, etc.).
6. Revealing your account password/passphrase to others or allowing use of your account by others. This includes family and other household members when work is being done at home.
7. Using a Smartnova computing asset to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws in the user's local jurisdiction.
8. Making fraudulent offers of products, items, or services originating from any Smartnova account.
9. Making statements about warranty, expressly or implied, unless it is a part of normal job duties.
10. Effecting security breaches or disruptions of network communication. Security breaches include, but are not limited to, accessing data of which the employee is not an intended recipient or logging into a server or account that the employee is not expressly authorized to access, unless these duties are within the scope of regular duties. For purposes of this section, "disruption" includes, but is not limited to, network sniffing, ping floods, packet spoofing, denial of service, brute-forcing accounts, and forged routing information for malicious purposes.
11. Port scanning or security scanning is expressly prohibited unless prior notification to the Data Protection Officer is made.

Information security policy	Editorial	1
	Page	5 3 7

12. Executing any form of network monitoring which will intercept data not intended for the employee's host, unless this activity is a part of the employee's normal job/duty.
13. Circumventing user authentication or security of any host, network, or account.
14. Introducing honeypots, honeynets, or similar technology on the Smartnova network.
15. Interfering with or denying service to any user other than the employee's host (for example, denial of service attack).
16. Using any program/script/command, or sending messages of any kind, with the intent to interfere with, or disable, a user's terminal session, via any means, locally or via the Internet/Intranet/Extranet.
17. Providing information about, or lists of, Smartnova employees to parties outside Smartnova.

4.3.2 Email and Communication Activities

When using company resources to access and use the Internet, users must realize they represent the company. Whenever employees state an affiliation to the company, they must also clearly indicate that "the opinions expressed are my own and not necessarily those of the company".

1. Sending unsolicited email messages, including the sending of "junk mail" or other advertising material to individuals who did not specifically request such material (email spam).
2. Any form of harassment via email, telephone, text, or paging, whether through language, frequency, or size of messages.
3. Unauthorized use, or forging, of email header information.
4. Solicitation of email for any other email address, other than that of the poster's account, with the intent to harass or to collect replies.
5. Creating or forwarding "chain letters", "Ponzi" or other "pyramid" schemes of any type.
6. Use of unsolicited email originating from within Smartnova's networks of other Internet/Intranet/Extranet service providers on behalf of, or to advertise, any service hosted by Smartnova or connected via Smartnova's network.
7. Posting the same or similar non-business-related messages to large numbers of Usenet newsgroups (newsgroup spam).

4.3.3 Blogging and Social Media

1. Blogging or posting to social media platforms by employees, whether using Smartnova's property and systems or personal computer systems, is also subject to the terms and restrictions set forth in this Policy. Limited and occasional use of Smartnova's systems to engage in blogging or other online posting is acceptable, provided that it is done in a professional and responsible

Information security policy	Editorial	1
	Page	6 3 7

manner, does not otherwise violate Smartnova's policy, is not detrimental to Smartnova's best interests, and does not interfere with an employee's regular work duties. Blogging or other online posting from Smartnova's systems is also subject to monitoring.

2. Smartnova's Confidential Information policy also applies to blogging. As such, Employees are prohibited from revealing any Smartnova confidential or proprietary information, trade secrets or any other material covered by Smartnova's Confidential Information policy when engaged in blogging.
3. Employees shall not engage in any blogging that may harm or tarnish the image, reputation and/or goodwill of Smartnova and/or any of its employees. Employees are also prohibited from making any discriminatory, disparaging, defamatory or harassing comments when blogging or otherwise engaging in any conduct prohibited by Smartnova's Non-Discrimination and Anti-Harassment policy.
4. Employees may also not attribute personal statements, opinions or beliefs to Smartnova when engaged in blogging. If an employee is expressing his or her beliefs and/or opinions in blogs, the employee may not, expressly, or implicitly, represent themselves as an employee or representative of Smartnova. Employees assume any and all risk associated with blogging.
5. Apart from following all laws pertaining to the handling and disclosure of copyrighted or export-controlled materials, Smartnova's trademarks, logos and any other Smartnova intellectual property may also not be used in connection with any blogging or social media activity

5. Policy Compliance

5.1 Compliance Measurement

The Data Protection Officer will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the policy owner.

5.2 Third Party Audit

The Board of Directors may run third party audit in order to check the compliance with this policy.

5.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

6. Related Standards, Policies and Processes

- Data Classification Policy
- Data Protection Standard
- Social Media Policy
- Minimum Access Policy
- Password Policy

Information security policy	Editorial	1
	Page	7 3 7