

OVERVIEW OF THE INFORMATION SECURITY POLICY OF DICTION LTD

May 2018

Extract from the Information Security Policy of Diction Ltd

Dear Client

Dear Interested Party and Job Applicant

Dear Contracting Partners

In our capacity as controller we are pleased to present you with this extract from our comprehensive Information Security Policy that applies to Diction Ltd. It gives a short overview of the information security principles and the established and controlled processes.

The Information Security Policy also applies to all companies that are active under Diction Ltd, in particular as subsidiaries in Switzerland, in the European Union or in another non-EU member state, and also to other contractually bound employees, freelance associates or service providers.

1. Information security principles of Diction Ltd

The information security principles (security policy) set out the strategy that is necessary to initiate and establish a holistic information security process within Diction Ltd as well as the objectives, responsibilities and roles. Specific rules on this are laid down in separate regulations.

Appropriate countermeasures are to be taken on all levels to prevent any potential security incidents at Diction Ltd. In addition to taking protective measures to ensure the correct operation of information technology, this also encompasses the protection of non-electronically processed information by means of corresponding security processes. The successful implementation of security processes is only possible with the active support of all employees, freelance associates and other service providers.

2. Objectives

Within the framework of professional necessities, the basic protection objectives of information security are the adequate availability, confidentiality and integrity of information.

They are defined as follows:

- **Availability:** safeguard that information, applications and IT systems are available to authorised individuals to the extent envisaged and within a reasonable period.
- **Confidentiality:** safeguard that sensitive information is only accessible to authorised users.

- Integrity: safeguard that sensitive information remains intact and complete

3. Guiding principles

Statutory and contractual requirements and voluntary undertakings are met.

The main criteria for suitable security measures are their efficacy in terms of the residual risk that has to be borne and economic adequacy.

When processing information, the basic requirements of information security are complied with. In line with its need for protection, information is processed appropriately and securely and adequately protected from unauthorised access.

IT systems are operated in an appropriately secure manner and environment which means that the availability requirements of IT-supported processes can be met.

All users have a basic understanding of information security issues and are expected to use information technology in an expedient and responsible manner.

The efficacy and appropriateness of security measures are regularly checked and documented. Deviations are analysed with a view to continuously improving the level of security. This encompasses the principles of information security and lower-level rules.

4. Responsibilities

From the organisational and strategic angle, leading roles in information security management within Diction Ltd are assumed by the:

Management team: the management team bears overall responsibility for information security within Diction Ltd.

Information Security Officer (ISO): The ISO is in charge of all strategic and tactical aspects of information security within Diction Ltd. He or she coordinates this task in a pertinent and crosstopic manner in cooperation with the contacts in the departments. The ISO reports directly to the management team.

The ISO consults the Data Protection Officer (DPO) of Diction Ltd (see under [Diction Privacy Statement](#) and [Data Protection Info Sheet](#)) promptly in the event of any shortcomings identified in the area of data security, and regularly reports to the DPO about examinations and training of employees and other service providers conducted by him or her.

Buchs, 11 May 2018

Patrick Fassbender, CEO of Diction Ltd