



# Information Security Policy Statement

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Circle FinTech Ltd' Management has established an Information Security Policy, which supports the strategic aims of the business and is committed to maintain and improve information security within the organization and minimize its exposure to risks. It is therefore Circle' policy <sup>1</sup> to:

- Ensure the confidentiality of corporate, and client information;
- Protect sensitive <sup>2</sup> information (however stored) against unauthorized access;
- Maintain the integrity of all information;
- Ensure the availability of information, as required;
- Provide information security training for all staff;
- Ensure that the expectations and requirements of all interested parties, in relation to Information Security, are met;
- Make information available to authorized business processes and employees when required;
- Meet all regulatory and legislative requirements <sup>3</sup>;
- Produce business continuity plans for business activities that are regularly maintained and tested;
- Ensure that all breaches of information security, actual or suspected, will be reported to and investigated by IT security personnel and opportunities for improvement will be identified and acted upon.
- Comply with the requirements of ISO 27001 for information security; and
- Communicate this policy statement to the public, through our website and on request.

The policy is dynamic and includes a commitment to continual improvement through a process of incident reporting, risk assessment and regular audits. It complements the established ISO 27001 Information Security Management Systems and provides a framework for establishing and reviewing security objectives. Management is responsible for communicating the company's Information Security Policy and making sure it is understood at all levels.

## Circle FinTech Ltd

**Signed:** 

**Name:** Redwan-ul Karim Ansari

**Date:** 27<sup>th</sup> March 2018

**Position:** Managing Director & CEO

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1. The policy is subject to annual review when it is amended as necessary to ensure it remains appropriate
  2. This applies to information that has been classified at any level other than 'Public' in accordance with the Circle FinTech Ltd' Information Classification Guide.
  3. This applies to compliance with the Data Protection Act 2002, record keeping, in relation to the Companies Act and Copyright