




Integrated Management System Policy

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MS-02

	Integrated Management System Policy			
	Code	Version	Classification	Page
	MS-02	4.0	-	2 de 7

	Elaborated by	Approved by
Name	Jorge Felix	Javier Mira
Position	QA and Systems Director	CEO
Date	31/01/2022	31/01/2022

Version	Date	Observations
1.0	26/06/2020	Initial version
2.0	24/09/2021	Review to bring it in line with ENS (National Security Scheme) and business continuity
3.0	13/12/2021	Reference is added to the place where the roles and responsibilities are detailed
4.0	31/01/2022	The standards included in the IMS are explicitly defined.



	Integrated Management System Policy			
	Code	Version	Classification	Page
	MS-02	4.0	-	3 de 7

Index

1. Scope and Mission.....	4
2. Development.....	5
3. Creation, updating, approval and communication	6



	Integrated Management System Policy			
	Code	Version	Classification	Page
	MS-02	4.0	-	4 de 7

1. Scope and Mission

This policy applies to the activities, services, assets, resources and all other parties involved in the provision of products and services of FacePhi Biometría S.A.

The scope includes aspects related to Information Security and Business Continuity, as well as complying with the requirements of the National Security Scheme. This is what composes the Integrated Management System (hereinafter IMS).

FacePhi's Information Security and Business Continuity objectives are based on the preservation of:

- a) its availability, ensuring that authorised users have access to the information and its associated assets when required.
- b) its confidentiality, ensuring that only those who are authorised can access the information.
- c) its integrity, ensuring that the information remains unchanged.
- d) its traceability, ensuring that it can be traced back to who has accessed and/or modified certain information associated with the service.
- e) Its authenticity, ensuring that whoever accesses the service is really the one who is created, and that it is possible to know who has accessed it.


Since the creation of the company, Information Security and Resilience have been established as a value proposition in each and every one of its activities. This has allowed FacePhi to differentiate itself from the competition, guaranteeing, in addition to availability, the correct functioning of systems and services, and compliance with any legal, regulatory or contractual requirement in relation to Security and Business Continuity.

Since its creation, FacePhi's mission has been to develop biometric technologies, always seeking improvement and excellence, in order to have the latest generation algorithms.

Facephi is aware of the importance of investing in R&D in order to keep up with the evolution of biometrics, as well as the commitment to security and resilience in all its processes:

- a) Preserving and ensuring the integrity of algorithms by analysing the threats that may affect biometrics and therefore pose a risk to their privacy.
- b) Managing and preserving the identity and privacy of the data.
- c) Ensuring the integrity and quality of the method, as well as the integrity of the code.



	Integrated Management System Policy			
	Code	Version	Classification	Page
	MS-02	4.0	-	5 de 7

The main value of the company is the human value as we have a committed, proactive and highly motivated team. In addition to this we can highlight:

- a) Innovation. Our DNA is in constant innovation
- b) Passion for what we do
- c) Teamwork
- d) Equality
- e) Consistency
- f) Commitment to the project
- g) Family

2. Development

FacePhi's Management wishes to make known, through this document, to its employees, clients, suppliers and other interested parties, its vision that safety management is a key factor for the correct development of the organisation. FacePhi understands Security as an integral vision that covers and considers the entire organisation and the services it provides, as well as the external parties related to the company.

FacePhi has achieved a position of trust from dozens of national and international entities, in various sectors, and most of them involved in the handling of highly confidential information. Achieving this credit would never have been possible without the firm conviction and effort to ensure the integrity, confidentiality, authenticity, traceability and availability of the information and systems that support it. FacePhi has always been aware that this strategy is crucial for the security and continuity of its business, as well as that of its customers.

This Security Policy shows the commitment of the Management, and has the following high-level objectives:

- a) To ensure compliance with applicable legislation, regulations and standards, as well as all those requirements that the organisation considers appropriate to carry out in order to maintain an Integrated Management System, which allows it to achieve continuous improvement of its performance.
- b) To meet the needs and expectations of interested parties, preserving the availability, integrity, confidentiality, authenticity and traceability of information.
- c) Demonstrate management leadership by ensuring that the security policy and security objectives are established and are compatible with the strategic direction of the organisation.



	Integrated Management System Policy			
	Code	Version	Classification	Page
	MS-02	4.0	-	6 de 7


- d) Assign the necessary roles and responsibilities in the security area and provide the necessary support under management leadership.
- e) Commit to continuous improvement as the primary mechanism for the evolution and adaptation of the organisation, improving its resilience.
- f) Implement effective and efficient preventive security measures, as well as the development and implementation of continuity plans.
- g) Establish and periodically review the level of security (risk appetite) based on risk analysis by also reviewing identified risks and their resolution or treatment. The review is carried out regularly, at least once a year, when the information handled changes, when the services provided change, when a serious security incident occurs and/or when serious vulnerabilities are reported.
- h) Periodic verification of continuity and contingency plans, as well as periodic tests and trials to obtain information and improvements, including drills and incident management tests, as well as the preparation and periodic review of Impact Analysis.
- i) To train, raise awareness and motivate personnel on the importance of complying with safety requirements. Continuous training programs are established with special attention to new personnel.
- j) Establish the correct structuring of the documentation as well as the appropriate management and updating of this body of regulations, as well as the criteria for access and permissions. The periodic review of this documentation also includes the review of this Security Policy document. FacePhi establishes a system of categorisation of the documentation according to its criticality, with 4 levels: confidential, restricted, internal and public.
- k) Consider the security established by its suppliers in order to ensure against possible risks from them.

3. Creation, updating, approval and communication

The Security Policy document is prepared by the Information Security and Quality area with the support of Management Committee. Chief Information Security Officer is responsible for ensuring that this document is adequate and up to date. In addition, it is the responsibility of all internal and external personnel related to FacePhi to comply with this Policy and to ensure that this is the case.

The approval of this Security Policy is carried out by the CEO of FacePhi with the advice of the Information Security area.



	Integrated Management System Policy			
	Code	Version	Classification	Page
	MS-02	4.0	-	7 de 7

This Security Policy will be notified to all employees, third parties and interested parties involved in the execution of activities related to the provision of products and services of FacePhi Biometría, S.A. In so far as applicable, it will be included in the training plans for staff and related third parties.

Alicante, January 31, 2022

Javier Mira Miró

CEO of FacePhi Biometría S.A

