



# Reward Gateway Information Security Management System (ISMS) Policy

Classification – Confidential

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## Policy

Information comes in a number of forms and is Reward Gateway's most important asset. It includes electronic, written, and spoken information. Information Security is the protection of this information from loss or misuse. The Leadership Team is committed to the proper protection of information and the Information Security Management System (ISMS) sets out how this is achieved. The Leadership Team takes responsibility for the continual improvement of our ISMS.

The company's business depends on its ability to protect its information. Without proper safeguards for information then our ability to appropriately share and use information is compromised and therefore, so is our ability to deliver service to clients. Loss or misuse of Personal Data entrusted to us would severely compromise our reputation and would have the potential to lead to irrecoverable damage to our trading position. The goal of the ISMS is to prevent such loss or misuse.

The Chief Technical Architect and the Head of Information Security in Infrastructure lead on Information Security, supported by the rest of the Senior Management Team and all employees. Information Security is Reward Gateway's single highest business priority. The proper protection of information is central to Reward Gateway's strategy and essential to achieving business objectives.

This ISMS formalises the framework for setting objectives and controls, including the structure of risk assessment and risk management. All employees are expected to adhere to it. The ISMS addresses the principles, standards, and compliance requirements which Reward Gateway uses to ensure the security of information. This includes:

1. Compliance with legislative, regulatory, and contractual requirements.
2. Security education, training, and awareness requirements.
3. Business continuity management.
4. Consequences of Information Security policy violations.
5. Definition of responsibilities for Information Security Management, including reporting breaches of this policy or loss or misuse of data.

This ISMS policy is communicated to all employees and it is mandatory that all comply with it.

## Revision history

Rev	Date	Author	Description	Approved	Date
2.1	11.08.2014	Veronica Walker	Regular review & update.	Glenn Elliott	18.08.2014
2.2	10.07.2015	Ivan Dichev	Template update Retail Operations. Manager changed to Information Security Manager. Extend of Leadership Team responsibilities.	Richard Hurd-Wood	01.09.2015
2.3	12.10.2016	Asen Varsanov	Board replaced with Leadership Team.	Richard Hurd-Wood	16.10.2016
2.4	01.03.2017	Liam Jones	Rebrand and general clean.	Will Tracz	03.03.2017
2.5	02.08.2018	Asen varsanov	Review and update	Will Tracz	03.08.2018