

Policy Statement of CMNTY Holding B.V.

The management of CMNTY declares to have implemented and fully integrated an Information Security Management System (ISMS) in the organization according to the standards of ISO 27001. The following scope has been defined: *The protection of information related to development, deployment, and support of CMNTY's online community platform, its customer hosting environment, and customer privacy data.*

The management system which we have completely integrated in our business is compliant with all relevant law and legislation as well as the wishes and demands of our critical stakeholders. Furthermore, this management system meets the continuous improvements demands which are set in the ISO 27001 standard.

Risk management

During the process of describing our organization and creating transparency in our business processes, we assessed whether there were sufficient (control) measures and resources (people, education, devices, IT infrastructure, etc.) in place to control or mitigate the risks following from the stakeholder- context- and information security risk analysis. In the areas where measures and resources proved to be insufficient, we have taken additional procedural, organizational and technical measures or provided the necessary resources. During the periodic reviews we evaluate whether the management system is still capable of mitigating and controlling these risks and whether the provides resources are sufficient to meet these goals.

Customer first

Customer demands and wishes are considered to be of great importance in our organization. Our main focus is to meet our customers' demands and wishes and continuously increase the level of customer satisfaction. Our (satisfied) customers ensure the continuity of our organization. The formulation of our customers' wishes originates from the analysis of our customer contacts. These wishes have been translated into the products and services we provide. In this management system we have described how we can remain loyal to our customers and how we can meet our customers' wishes and demands in the field of information security. At least yearly we will assess and update our insights regarding the wishes and demands of our customers and other relevant stakeholders prior to the management review.

Information security

Information is one of the most important assets of an organization. Ensuring accessibility and reliability of data is an essential part of a responsible business operation. Information security is the umbrella term for the processes and measures which are implemented in order to protect and guarantee the reliability of our operations and information stored in information processing systems. Information security's primary focus is the balanced protection of the confidentiality, integrity and availability of data:

- Confidentiality** Protecting information against unauthorized persons. Information is only available on a "need-to-know" basis;
- Integrity** Ensuring and maintaining the accuracy and completeness of information over its entire lifecycle;
- Availability** Ensuring the availability of information and information processing resources at the right time and place for the right users.

Information security management system (ISMS)

This management system contains our processes and procedures, in which the ISO 27001 standard was taken as starting point. Our management is responsible for overall compliance with this management system by all employees and overall compliance with applicable law and legislation. The security officer is responsible for maintaining an effective ISMS and he/she ensures that everyone within organization is aware of the objectives of the management system, understands them and is able to execute the required actions.

All employees are instructed to comply with CMNTY's information security policies and more specific with CMNTY's information security protocol. Management assesses the implementation, operation and effectiveness of the ISMS at least yearly, according to the management review agenda and annual agenda.

Control measures

Every employee has the right and the responsibility to report improvements in the field of information security. Our aim is to continuously improve our processes and our ISMS in order to be able to meet and exceed our customers' wishes. The Statement of Applicability gives an overview of the control measures we have taken during the implementation of our management system.

Annual goals

Every year, new goals in the field of information security are formulated during the assessment of our management system. During this management review we also evaluate the goals which were formulated the previous year. These annual goals, together with the stakeholder- and risk analysis and the statement of applicability are an essential and integral component of this policy statement.

New York, December 4, 2018

Maxim Schram
Founder & CEO
CMNTY Holding B.V.