



# Description of Organization and Security Measures for Information Resources at ATM S.A.

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## Background

Information security plays a unique role in ATM S.A. business strategy, which is reflected in the effective security solutions applied:

- **Legal and regulatory;**
- **Organizational;**
- **Technical.**

Legal and regulatory safeguards boil down to observance of the provisions and compliance with the law, but also the application of normative guidelines both in the organizational scope (information security management systems) and technical requirements (management systems and technical infrastructure security). The legal environment of clients also compels ATM SA. to implement many restrictive requirements resulting from industry regulations or directly from contracts with clients, and due to its wealth of experience, ATM S.A is able to select optimal security tools.

Organizational solutions mean adherence to appropriate policies, procedures and requirements in the area of security organization, including division into protection zones, access rights, control of flow of persons and vehicles.

The sphere of technical solutions includes securities in the field of alarm systems and security automation of colocation infrastructure, server rooms, administrative buildings, etc.

The implemented and effectively functioning Information Security Management System (ISMS) consistent with the requirements of ISO/IEC 27001:2014-12 is an important tool in the implementation of the above-said requirements. The effectiveness of the ISMS is evidenced with the certificate of the BSI certification body, which is a co-founder of the global ISO standards.

### Physical and Environmental Security

Safety of flow of persons and vehicles in the administrative area of ATM S.A. is supported by the following:

- **CCTV system;**
- **Access control system;**
- **Intruder alarm system.**

The administrative area of the registered office of ATM S.A. is protected with a fence that meets the requirements for mechanical and construction protection. Both the fence and the area around it are under constant surveillance of the CCTV system cameras.

The area around the buildings of ATM S.A. it is illuminated and also under the supervision of the CCTV system. All facilities and server rooms are separate security zones with independent intruder alarm, electronic access control and CCTV systems. The server rooms are windowless and meet the normative requirements for electronic, mechanical and construction protection.

Depending on the type of service provided by ATM S.A., the entry to the server room is possible only for authorized users (the employees of ATM or the given client), authorized, registered and supervised in the electronic system. Entry and exit, after prior identification of the person, is recorded by the reception staff (or other authorized services) in the system of entry records and server room permits (full accountability of the person's stay in the server room and on the campus). The presence view (in the CCTV system) is made available to the services responsible for the company's security. Alarm systems are included in the monitoring system of a licensed property protection company and guarantee the arrival of armed intervention patrols if it is necessary to support local security service.

Entry into the administrative area of the ATM S.A. it is limited with barriers and monitored by CCTV system cameras. All office and administrative and production facilities (server rooms) as well as access to them are monitored 24 hours by uniformed qualified property protection personnel. Vehicle traffic is subject to constant observation and control, if justified.

Signals from security systems, i.e. intruder alarm, access control, CCTV, fire alarm and premises automation, are received by the integrated and dedicated data centers which continuously monitor the infrastructure, power supply and security of server rooms, administrative and office facilities and other important resources used to provide services.

The continuity of operations in server rooms is one of the key tasks of the technical and energy services at ATM SA. It is implemented through a cascade and redundant power supply system covering, among other things, UPS, dedicated power generators and redundant power stations.

The following services operate in Atman Data Center facilities:

- **Reception service;**
- **Protection of the premises and buildings of the data center (licensed property protection firm);**
- **Technical service;**
- **Customer Service and NOC (Network Operations Center).**

All security and infrastructure services work in a continuous mode, i.e. 24/7/365.

## **Integrated Management System at ATM S.A.**

The information security system at ATM S.A is based on the Integrated Management System Policy adopted by the Management Board which sets out the strategy of operation and how it is implemented.

The strategies included in the Information Security Policy are the basis for the functioning of the information security management system at ATM SA. The administration and management services provided at Atman Data Center are covered by a management system compliant with the PN-EN ISO 9001:2015-10 standard and the Information Security Management System (ISMS) compliant with the ISO/IEC 27001:2014-12 standard.

ATM S.A. received a certificate issued by BSI (British Standards Institution) confirming that the colocation and administration services provided under the Atman brand comply with the Declaration of Application and that the company operates based on an information security management system compliant with the ISO/IEC 27001:2014-12 standard. This means that ATM S.A. provides high quality customer service, and the certificate guarantees the maintenance of this standard.

Awareness and commitment to maintaining information security and quality of services on a daily basis is the greatest value of our organization, and the obtained certificates are primarily a confirmation that we manage the information security and quality in a systematic manner.

## **Execution of Services in Compliance with Laws**

In addition to a number of requirements arising from the legal environment of ATM S.A. clients and organizations, as a processor aware of its role, currently puts a special emphasis on meeting the requirements of the European General Regulation on Personal Data Protection (GDPR) in the areas of organizational and technical and physical protection of personal data processing.

Introduction of the above legal, organizational and technological security measures guarantees meeting the highest information security requirements for services provided to ATM S.A. clients.

Premises security is monitored and systematically improved by conducting security risk analysis and audits carried out as part of the certified Information Security Management System in accordance with ISO/IEC 27001:2014-12. This system includes internal processing of personal data as well as risk and impact assessment for data protection.