

## 1. Purpose

Innovation Fund Denmark's information security policy describes the importance of working with information security and determines our level of ambition for this. The information security policy contains the overarching safety objectives and form the basis for the design of Innovation Fund Denmark's underlying guidelines and business processes.

The information security policy describes the management-approved level of security. The policy must also support the awareness of information security in the Innovation Fund Denmark's organization, including in the Fund's committee. Guidelines designed to support the main objectives of information security policy shall ensure, that all employees work with and relate to information security in their daily work.

Innovation Fund Denmark not only sees a high level of security as a requirement to be able to comply with legal and regulatory requirements, but also as a quality element to be able to offer a secure service for applicants, partners, etc. Information security is therefore a key value at Innovation Fund Denmark, and it will be a natural part of our IT activities.

## 2. Scope

The information security policy applies to the Innovation Fund Denmark's organization. All suppliers and partners who have physical or logical access to systems, data and information must be made aware of the policy and follow it.

The information security policy covers all technical and administrative matters that have direct or indirect influence on the operation and use of the Innovation Fund's IT systems.

## 3. Main objectives and level of security

Innovation Fund Denmark has the following safety objective:

**“Innovation Fund Denmark will have an appropriate and sufficient level of technical and organizational security that applies for all employees, partners and suppliers, when processing personal data and other data, both in relation to fully or partially automatic data processing as well as processing of manual documents”**

An adequate level of information security is achieved through security measures that ensure:

- 1) Confidentiality, integrity and availability of Innovation Fund Denmark's systems and data in relation to the risk assessment, which is set for each system / data.
- 2) Protection of Innovation Fund Denmark's IT assets, employee competencies, the organization's image and information / data in custody.

In order to maintain the adequate level of security, the following must be observed:

- Guidelines and procedures must be in place to ensure that information security is an integrated part of operations and daily work.
- Innovation Fund Denmark must, through contract and supplier management, ensure that the use of external consultants, partners and suppliers do not undermine Innovation Fund Denmark's information security level.
- Innovation Fund Denmark must follow up on information security by continuing to optimize the management system through ongoing maintenance and optimization of information security policy and the related guidelines and business procedures. The goal is to ensure a structured and continuous improvement process.

#### 4. Organization and responsibility

Innovation Fund Denmark's safety objective:

**"All employees are responsible for information security. They are familiar with and comply with our information security policy, guidelines and business procedures in Innovation Fund Denmark."**

Planning, implementation and control of information security is defined by the management.

The information security coordinator is responsible for the implementation and maintenance of the information security system and is responsible for monitoring security incidents.

The director is responsible for working with information security at a strategic level so that information security considerations are included in all significant decisions. Managers and employees are responsible for complying with guidelines and procedures for safety in daily work.

The necessary knowledge and competence regarding information security is communicated to all employees, and there will continuously be worked on the attitudes and knowledge about information security.

#### 5. Guidelines and procedures regarding information security

The information security policy is elaborated upon in general and specific guidelines for information security and the associated procedures, instructions, and rules.

Guidelines and procedures are structured according to ISO27001 Annex A.

## 6. Risk assessment and classification

The information security is at a level that meets legal and regulatory requirements, contractual obligations and obligations towards the players who are obliged to use Innovation Fund Denmark. Innovation Fund Denmark does not want to secure at all costs, but want to be aware of all risks, and deal satisfactorily with these, establishing an adequate level of security.

The management actively participates in risk assessment and is responsible for assessing threats, consequences and risks of IT systems and other relevant areas.

The risk assessment is updated at least once a year, as well as in the event of any major changes to tasks, suppliers, IT systems or their use.

To ensure that our systems and data have the right level of security, these must be classified. Data and systems are classified according to availability, integrity and confidentiality. The Innovation Fund Denmark also refers to Article 32 of the Data Protection Regulation (processing security) in the processing of personal information.

The accessibility criterion states that it must be possible to access systems and data for authorized persons when this is required.

Integrity means that data is complete, accurate and up to date.

Confidentiality means that only authorized persons have the right to access the information, and that the information must only be available to authorized persons.

## 7. Violation of information security policy

All employees of Innovation Fund Denmark are obliged to comply with the information security policy at any time, with associated guidelines and business procedures. A violation may, after the circumstances, entail employment law sanctions.

If an employee is aware that Innovation Fund Denmark's information security is being violated, it must be notified to the information Security Coordinator or director as soon as possible.

## 8. Deviations

If situations arise where the requirements of information security policy are not complied with, the director of Innovation Fund Denmark must apply for an exemption. Any deviations from the requirements must be documented, and alternative safeguards must be put in place.

## 9. Preparation and entry into force

The information security policy has been prepared by the Information Security Committee and approved by the management.

This policy has been approved by Director Anne-Marie Levy Rasmussen, 02.06 2020