



Trust Services, PEC Services and SPID Information Security Policy

Intesi Group S.p.A., a company certified and authorized for the provision of Qualified Trust Services (Trust Service Provider for services related to signatures, seals, time stamps and SERCQ) and PEC and SPID Services in accordance with Regulation (EU) 910/2014 eIDAS and ETSI product standards, defines in this Policy its organization's approach to information security management.

The Management of Intesi Group S.p.A. is committed to defining and approving its own policies and operating practices, for the delivery of the services defined above, which are made available to its organization and all external stakeholders. Management also ensures that any changes to this policy and operating practice documents are communicated to users, interested parties, certification bodies, supervisory and regulatory bodies, as relevant.

Intesi Group S.p.A. is committed to delivering its services:

- by defining its organization and infrastructure in procedures, which specify the security controls it ensures to maintain for the delivery of its services;
- ensuring the activation of physical and environmental security systems with respect to its operational systems;
- maintaining overall responsibility for the directions in this policy even if some functionality is performed by outsourcers, with whom it formally defines the responsibilities of the outsourcers and ensures that they implement all the controls required by the TSP-Trust Service Provider;
- ensuring that it reviews, at planned intervals or when there are significant changes in its organization or infrastructure, its information security policy and asset inventory to ensure their continued suitability, adequacy, and effectiveness; management is responsible for prior approval of any changes that may impact the level of security provided;
- regularly checking the systems configuration for changes that violate the TSP's security policies; the maximum interval between two checks is documented in the trust service documentation;
- ensuring its financial stability and the resources necessary to operate in accordance with this policy;
- formally assigning security roles and responsibilities available to relevant personnel;
- enforcing its own policies to ensure limited and controlled access to information;
- enforcing its change control procedures in the case of releases, changes, and emergency fixes to operational software and in the case of configuration changes to TSP systems
- ensuring that it does not use its TSP systems for other purposes.

Intesi Group S.p.A. is committed to providing its services by operating impartially and without discrimination, supervising its personnel to operate independently of any commercial, financial or other pressures.

Milano, 28 March 2024

President and CEO

Paolo Sironi