Luminor

Luminor Bank
Information Security
Policy



INFORMATION SECURITY POLICY

Luminor acknowledge and understand its responsibilities to ensure the safe guardianship of any information entrusted to us whether, client, supplier, or other stakeholders. Failing to protect such information could potentially harm individuals' rights, negatively impact Luminor clients and/or Luminor's reputation and brand, whilst also potentially leading to regulatory sanctions and financial penalties or other forms of liabilities and losses.

Luminor takes Information Security very seriously and takes the treating of risk as a priority. Due that Luminor's established Information Security Policy, which sets out framework for the management of Information Security and Information Security risks across the Luminor and addresses Information Security requirements of confidentiality, integrity, and availability.

Information Security Management Framework (ISMF) is based on the international ISO 27002 standard, best practices and manages all the tools and controls that the bank uses to protect its information. Chief Information Security Office is responsible for leading and coordinating the development and implementation of ISMF.

By creating ISMF, Luminor ensures that:

- Information Security Policy, Information Security Standard, guidelines are established and maintained.
- Management plays an integral part in setting specific, measurable, achievable, relevant, and timely objectives
 that are reviewed and audited against at planned intervals.
- Accountability for Information Security is assigned to dedicated resources with the requisite expertise.
- Information Security risks are identified and treated in accordance with their criticality level to remain within risk appetite.
- Information Security training is available and mandatory for all employees.
- · Information Security controls are implemented, and their effectiveness continuously measured and improved.
- Information Security incidents are identified and managed in a timely manner.
- Compliance with regulatory, statutory, contractual, and internal policy obligations is monitored and achieved.

