



SSG 5010

Information Security and Privacy Policy

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1 Objective

Establish guidelines that allow Segura®s Employees and Third Parties to have direction on information security and privacy-related standards of behavior appropriate to the business and legal protection needs of Segura® and its national and international affiliates and their employees.

Preserve the information as:

- Integrity: guarantee that the information is maintained in its original state, aiming to protect it, during storage or transmission against undue alterations, whether intentional or accidental.
- Confidentiality: guarantee that access to information is obtained only by authorized persons.
- Availability: ensuring that authorized users can gain access to the information and corresponding assets whenever they need them.

2 Field of Application

This document applies to MT4 and its domestic and international subsidiaries, with a corporate-wide scope, covering all employees (including contractors and interns), candidates in recruitment and selection processes, service providers, and partners.

3 Abbreviations

- ISMS - Information Security Management System
- ISPP - Information Security and Privacy Policy

4 Applicable Documents

- General Personal Data Protection Law, Law No. 13,709.
- Regulation (EU) 2016/679 of the European Parliament - GDPR
- ISO/IEC 27001

5 Responsibilities

Department	Responsibilities	Authorities
IT - RDO	Refine policies	Review
Users	Comply with policies	Propose improvements
Top Management	Establish policies	Approval

6 Policy

Recognizing the need to implement efficient management, Segura establishes an Information Security Management System (ISMS) and the following Information Security and Privacy Policy (ISPP).

Our Information Security and Privacy Policy aims to provide a detailed record of concepts, norms, and procedures that ensure not only technical guidance but also the competent delivery of services. Our policy reaffirms our unwavering commitment to protecting the information assets under our ownership and/or custody. Furthermore, we relentlessly pursue continuous improvement aligned with our established objectives, aiming to fully meet applicable requirements related to information security and privacy.

Our proactive and comprehensive approach includes implementing robust cybersecurity measures, adopting best practices for data protection, and promoting an organizational culture centered on information security and privacy. These initiatives are fundamental to strengthening our security posture and protecting the organization's critical data integrity, confidentiality, and availability.

Segura will not respond to requests for the disclosure of Personally Identifiable Information (PII) without legal justification. Whenever possible, the client will be consulted in advance before any sharing of PII. If there is a contractual provision for this type of request, it will only be fulfilled with the client's express authorization.

The use of third parties (subcontractors) for the processing of PII will be communicated to the client in advance and carried out only if there is specific contractual authorization for that purpose.

Segura reiterates its commitment to providing the necessary resources and continuous support to ensure the success and effectiveness of our Information Security and Privacy Policy. We are dedicated to building and maintaining a secure and reliable environment for our employees, clients, and partners.

7 Review History

Version	Date	Editor	Approver	Description
1	01/31/2022	RDO	Board of Directors	Document Creation
2	04/03/2022	RDO	Board of Directors	Public version
3	09/12/2022	Compliance	Board of Directors	Adequacy following LGPD 2018 and GDPR 2016
4	05/20/2023	Compliance	Board of Directors	Document Maintenance
5	10/07/2023	Compliance	Board of Directors	Template Adequacy
6	05/06/2024	Compliance	Compliance	Content Update
7	04/23/2025	Compliance	Compliance	Policy Review
8	05/08/2025	Compliance	Compliance	Content Update
9	26/01/2026	Compliance	Compliance	Policy Review