

## Information Security Policy

CapCloud Academy Solutions B.V.

CapCloud provides an online platform that processes personal data on behalf of its clients. This is a major responsibility in terms of data protection and CapCloud is very conscious of this responsibility. Data in the cloud provides many possibilities and options, but it also presents challenges. It is our job to meet the challenges of data protection head on, and to guarantee security, so that the opportunities for our clients can be used to their full potential. We highly value the trust you place in us.

Luxoolseweg 2  
3862 WJ Nijkerk  
The Netherlands

T: +31 881 702010  
E: [info@capcloud.academy](mailto:info@capcloud.academy)  
W: [www.capcloud.academy](http://www.capcloud.academy)

Dutch Trade Register  
No. 53.41.99.87

As a matter of policy, CapCloud will:

- Run an information security management system according to ISO 27001;
- Comply with all legal and client requirements related to privacy and data protection, including the duties regarding the reporting of data breaches;
- Keep a non-executive Data Protection Officer appointed and registered with the Dutch Data Protection Authority;
- Reduce security risks to a level As Low As Reasonably Practicable (ALARP);
- Strive for a web application provided to its clients that is intrinsically secure, minimising the influence of human error and deliberate actions on security risks;
- Take a precautionary approach where security risks are unclear or control cannot be guaranteed;
- Balance information security measures with usability, ensuring acceptance and full deployment of those measures and avoiding, errors, ignorance or deliberate deviations;
- Work actively together with its vendors and clients recognising that information security is ultimately a joint effort;
- Actively promote correct usage and secure behaviours with end users;
- Continually improve its information security system and performance.

The board of CapCloud takes full ownership of and responsibility for information security management. Everyone is invited to address issues and ideas which may contribute to increased security, either directly to the board or to our Data Protection Officer ([dpo@capcloud.academy](mailto:dpo@capcloud.academy)).

December 2019,

Bart Dijkhuizen  
*Managing Director*

